

EXHIBIT 1:

EXCERPTS OF THE CORE RELIGIOUS “BIBLE” OF FALUN GONG: ZHUAN FALUN

Zhuan Falun is described as the core or main text of the Falun Gong School, in Falun Gong texts.

1. “The truth is, no matter how many more scriptures we publish, they are merely supplementary materials to *Zhuan Falun*. Only Zhuan Falun can truly guide your cultivation. It contains inner meanings that go from the level of ordinary people to incomparable heights. As long as you continue to cultivate, *Zhuan Falun* will always guide your elevation in cultivation.” (Comments for Republication, 1994).
2. “The Dafa book *Zhuan Falun* is for systematic cultivation. Go read it. As for the other books... they’re only supplementary materials to be read for reference.” (Teaching the Fa at the Assistants’ Fa Conference in Changchun, July 1998).
3. “The book *Zhuan Falun* contains everything. Actually, all of the things I’ve spoken about are contained in *Zhuan Falun*. It’s only that I’ve spoken more specifically to students in various regions with regard to their situations. Don’t be attached to those things, calm down, and cultivate steadily. *Zhuan Falun* is the main book, while other things are supplementary reading.” Teaching the Fa at the Conference in Singapore, August 1998.
4. “[But] I’ll tell you that if you want to cultivate in a systematic way, you have to focus on one book, *Zhuan Falun*. All other books are only for your reference. The supplementary books have different supplementary value at different levels, since different inner meanings exist at different levels. Yet if you want to cultivate systematically, go by *Zhuan Falun*. That’s why you should read *Zhuan Falun* repeatedly.” Teaching the Fa at the Eastern U.S. Fa Conference, 1999.
5. “If I talk about something too profound, many people may not understand it. As I intended, I have not systematically taught the Fa for two years already because the Fa that I gave to man has already been left in its entirety. I did not even have people record my lectures. Why is it? Many people are seeking novelty. What else has the teacher said or talked about? They are going after such things instead of practicing cultivation steadily. What I gave man for cultivation practice is Zhuan Falun, and this book is the systematic Fa. The other things that I have said are merely interpreting Zhuan Falun and they are all supplementary. If recordings are made and passed around in society, it will create interference for those genuine practitioners. The book Zhuan Falun is systematic from the lower level to the higher level, and what I am talking about now are only directed at the people present here.” 1999 Lecture in Sydney,” <http://en.falundafa.org/eng/lectures/1996L.html>
6. “Throughout the entire course of my lectures on the Fa and cultivation practice, I have been responsible to society and practitioners. The results we have received have been good, and their impact upon the entire society has also been quite good.” Li Hongzhi, Zhuan Falun, Lecture One, “Genuinely Guiding People Towards High Levels,” 2000 edition.

7. Brief Introduction to Falun Dafa

Falun Dafa (also called Falun Gong) is an advanced practice of Buddha school self-cultivation, founded by Mr. Li Hongzhi, the practice's master. It is a discipline in which "assimilation to the highest qualities of the universe—Zhen, Shan, Ren (Truthfulness, Compassion, Forbearance)—is the foundation of practice. Practice is guided by these supreme qualities, and based on the very laws which underlie the development of the cosmos." Master Li's teachings are set forth in a number of texts, among which are included Falun Gong, Zhuan Falun, The Great Perfection Way of Falun Dafa, Essentials for Further Advancement, and Hong Yin (The Grand Verses). These and other works have been translated into thirty-eight languages, and are published and distributed worldwide. (<http://en.falundafa.org/>, last visited November 8, 2017)

EXHIBIT 2

EXCERPTS OF TEACHINGS OF ZHUAN FALUN

Divine Creator

1. “It was DAFA [/the Buddha FA] that created time and space, the multitude of lives and species, and all of creation. Zhuan Falun, “Lunyu,” 2000 edition.¹
2. “It is the Buddha Fa that created the immense cosmic body, and not these Buddhas, Daos, and Gods.” Essentials for Further Advancement, “The Buddha Fa and Buddhism” (April 2001) at URL <http://en.falundafa.org/eng/jjyz75.htm>.
3. “What is the Buddha FA, then? The most fundamental characteristic of this universe, Zhen-Shan-Ren, is the highest manifestation of the Buddha FA. It is the most fundamental Buddha FA. The Buddha FA manifests different forms at different levels and assumes different guiding roles at different levels. Zhen-Shan-Ren is the highest manifestation of the Buddha FA.” Zhuan Falun, Lecture One, “Zhen-Shan-Ren is the Sole Criterion to Discern Good and Bad,” 2000 edition.

Imponderables

4. “One should return to one’s original, true self; this is the real purpose of being human. Therefore, once a person wants to practice cultivation, his or her Buddha-nature is considered to come forth,” Lecture One, “Genuinely Guiding People to Higher Levels,” 2000 edition.²
5. “The Tao School does not offer salvation to all beings. What it faces are not all kinds of people with different mentalities and levels, some of whom are more selfish and others less selfish. It selects its disciples. If three disciples are selected, only one of them receives the real teaching.” Lecture One, “Characteristics of Falun Dafa,” 2000 edition.
6. “The Buddha School [...] develops an aspiration to offer salvation to all beings.” Lecture One, Zhen-Shan-Ren is the sole Criterion to Discern Good and Bad,” 2000 edition.
7. “In providing salvation to humankind, the Buddha School does not attach any condition or seek returns, and it will help unconditionally.” Lecture One, “Genuinely Guiding People To Higher Levels,” 2000 edition.
8. “In the Buddha School, “salvation of all beings” implies bringing you out of everyday people’s most agonizing state to higher levels. You will no longer suffer, and will be set free—that is what it implies.” Lecture Two, “The Supernormal Ability of Precognition and Retrocognition,” 2000 edition.

¹ “Dafa” and the “Buddha FA” are used interchangeably in the Falun Gong School. In Essentials for Further Advancement, one article, “The Buddha Fa and Buddhism,” uses the interchangeable name, the Buddha Fa as that which “created the immense cosmic body.” See supra at ¶ 2.

² See also “Clarify the Mind, Hong Yin I “I spread the Fa, your Master, for salvation of all.”)

Cultivation Leads to Salvation

9. “If a human being is to understand the mysteries of the universe, space-time, and the human body, he must take up cultivation of a true Way and achieve true enlightenment, raising his plane of being. Through cultivation his moral character will elevate, and once he has learned to discern what is truly good from evil, and virtue from vice, and he goes beyond the human plane, he will see and gain access to the realities of the universe as well as the lives of other planes and dimensions.” *Zhuan Falun*, “Lunyu,” 2000 edition.

10. “Therefore, once a person wants to practice cultivation, his or her Buddha-nature is considered to have come forth. Such a thought is most precious, for this person wants to return to his or her original, true self and transcend the ordinary human level.” (Lecture One, “Genuinely Guiding People to Higher Levels,” 2000 edition); “And any cultivator who is able to become one with Dafa is an enlightened one—divine.” “Lunyu,” 2000 edition.

11. “Isn’t he a person who has attained the Tao through practicing cultivation? Isn’t he a great enlightened person? How can he be considered the same as an everyday person? Isn’t he an enlightened person through cultivation practice? Isn’t it correct to call him an enlightened person? In the ancient Indian language he is called a Buddha. Actually, that is it. This is what qigong is for.” *Zhuan Falun*, Lecture One, “Qigong is Cultivation Practice.”

12. “Our Falun Dafa is one of the eighty-four thousand cultivation ways in the Buddha School. During the historical period of this human civilization, it has never been made public. In a prehistoric period, however, it was once widely used to provide salvation to humankind. In this final period of Last Havoc, I am making it public again. Therefore, it is extremely precious.” (Lecture One, “Characteristics of Falun Dafa,” 2000 edition)

13. In fact, orthodox religions that have appeared in history in the world such as Christianity, Catholicism, Buddhism, Taoism, and including Judaism, could all enable the human heart to turn to goodness while, in the meantime, enabling those who genuinely wanted to move up in cultivation practice to attain the Fa and complete their cultivation practice. See Exhibit 3 at 1 (“1996 Lecture in Sydney,” available at <http://en.falundafa.org/eng/lectures/1996L.html>.)

Cultivation is Not For Healing Illness

14. “Offering salvation to humankind means you will be genuinely practicing cultivation, and not just healing illness and keeping fit.” Lecture One, “Genuinely Guiding People to Higher Levels,” 2000 edition.

15. “I do not talk about healing illness here, and neither will we heal illness. As a genuine practitioner, however, you cannot practice cultivation with an ill body. I will purify your body. The body purification will be done only for those who come to truly learn the practice and the Fa.” Lecture One, “Genuinely Guiding People to Higher Levels,” 2000 edition.

Ethical /Moral Code of Conduct

16. “It is well known that when we truly practice cultivation ... [we] practice Shan (compassion).” Zhuan Falun, Lecture Eight, “Collecting Qi,” 2000 edition.

17. “During the process of transforming karma, ... you should always maintain a heart of benevolence and a mind of kindness. ... When you always maintain a heart of benevolence and compassion (shan), you will have time to buffer the confrontation and think, should a problem arise suddenly. If you always think about competing with others and fighting back and forth, I would say that you will start a fight with others whenever there is a problem. Thus, when you encounter a conflict, I would say that it is to transform your black substance (“karma”) into the white substance ‘de.’” Zhuan Falun, Lecture Four, “Transformation of Karma,” 2000 edition.

18. “As practitioners, you will suddenly come across conflicts. What should you do? You should always maintain a heart of compassion and kindness. Then, when you run into a problem, you will be able to do well because it gives you room to buffer the confrontation. You should always be benevolent and kind to others, and consider others when doing anything. Whenever you encounter a problem, you should first consider whether others can put up with this matter or if it will hurt anyone. In doing so, there will not be any problems. Therefore, in cultivation practice you should follow a higher and higher standard for yourself.” Zhuan Falun, Lecture Four, “Upgrading Xinging,” 2000 edition.

19. “Of course, in practicing cultivation in ordinary human society, we should respect parents and educate our children. Under all circumstances, we must be good and kind to others, not to mention to our family members. We should treat everyone in the same way. We must be good to our parents and children and be considerate of others in all respects. Such a heart is thus unselfish, and it is a heart of kindness and benevolence.” Zhuan Falun, Lecture Six, “Demonic Interference From One’s Own Mind,” 2000 edition.

20. “In practicing Zhen-Shan-Ren, the Tao School emphasizes the cultivation of Zhen [truthfulness]. Therefore, the Tao School believes in the cultivation of Zhen to nurture one’s nature; one should tell the truth, do things truthfully, become a truthful person, return to the original, true self, and in the end, become a true person through cultivation. Nevertheless, it also includes Ren [tolerance] and Shan [compassion], but with an emphasis on the cultivation of Zhen. The Buddha School emphasizes cultivating Shan of Zhen-Shan-Ren. Because the cultivation of Shan can generate great, benevolent compassion, and when compassion develops one will find all beings suffering, the Buddha School thus develops an aspiration to offer salvation to all beings. It also has Zhen and Ren, but with an emphasis on the cultivation of Shan. Our Falun Dafa is based upon the highest standard of the universe, Zhen, Shan, and Ren [Truthfulness, Compassion, and Tolerance], all of which we cultivate simultaneously.” Zhuan Falun, Lecture One, Zhen-Shan-Ren is the sole Criterion to Discern Good and Bad,” 2000 edition.

21. What is a “heart of great forbearance?” As a practitioner, the first thing you should be able to do is to not fight back when you are beaten or sworn at—you must be tolerant. Otherwise, what kind of practitioner will you be? Someone says: “It’s really hard to be tolerant, and I’ve got a bad temper.” If your temper is not good, you should change it, for a practitioner must be tolerant. [...] If you cannot even get over a trifle and lose your temper easily, how can you expect to increase your gong? Someone says: “If someone kicks me while I’m walking down the street and no one around

knows me, I can tolerate it.” I say that this is not good enough. Perhaps in the future you may be slapped in the face twice, and you will lose face in front of someone whom you least want to see it. It is to see how you will deal with this issue and whether you can endure it. If you can tolerate it and yet it preys on your mind, it is still not good enough. As you know, when a person reaches the Arhat level, in his heart he is not concerned about anything. He does not care at all in his heart for any ordinary human matter, and he will always be smiling and in good spirits. No matter how much loss he suffers, he will still be smiling and in good spirits without any concern.” (Lecture Nine, “People With Great Inborn Quality,” 2000 edition.)

22. In a specified [other] dimension, there is a field that surrounds the human body. The field is the “de” (virtue, merit) that we have mentioned.³

23. “One loses *de* when one commits wrongdoing. How does a person lose *de*? When a person swears at another, he thinks that he has gained the upper hand and feels good. There is a principle in this universe called “no loss, no gain.” To gain, one has to lose. If you do not want to lose, you will be forced to lose. Who plays such a role? It is precisely the characteristic of the universe that assumes this role. Thus, it is impossible if you only wish to gain things. What will happen then? While swearing at or bullying another person, he is tossing *de* at this other person. Since the other person is the party that feels wronged and has lost something and suffered, he is compensated accordingly. While one person is here swearing, with this swearing, a piece of *de* from his own dimensional field leaves and goes to the other person. The more he swears at him, the more *de* he gives him. The same is true with beating up or bullying others. As one hits or kicks another person, one will give one’s *de* away according to how badly one beats up the other person.” Zhuan Falun, Lecture One, “Why Doesn’t Your Gong Increase with Your Practice?”

24. “Everyone sits here to learn this Dafa, so you must here conduct yourselves as true practitioners, and you must give up attachments. [...] To tell you the truth, the entire cultivation process for a practitioner is one of constantly giving up human attachments. In ordinary human society, people compete with, deceive, and harm each other for a little personal gain. All of these mentalities must be given up.” Lecture One, “Genuinely Guiding People Towards Higher Levels.”

25. “Killing does not only bring about a lot of karma, it also involves the issue of compassion. Shouldn’t we have compassion as practitioners? When our compassion emerges, we will probably find all living beings and every person suffering.” Lecture Seven, “The Issue of Killing,” 2000 edition.

26. “[Y]ou should pay attention to *xinxing* cultivation and practice cultivation according to the characteristic of the universe, Zhen-Shan-Ren. You must completely dispose of ... immoral thoughts, and the intention of wrongdoing.” Lecture One, “Why Doesn’t Your Gong Increase with Your Practice,” 2000 edition.

³ See also “Falun Gong” which also emphasizes the importance of the cultivation of “de.” (“Why is it that many people cultivate but their *gong* fails to develop? It is precisely because they don’t cultivate virtue. [...] The close to ten thousand volumes of the *Tripitaka* and the principles that Shakyamuni taught for over forty-some years all talked about one thing: virtue. The ancient Chinese books of Daoist cultivation all discuss virtue. The five-thousand-word book by Lao Zi, *Dao De Jing*, also contemplates virtue (*de*). Some people still fail to understand this.” (Falun Gong, Lecture III, “Loss and Gain,” April 2001 edition.)

27. “Thus, practitioners should be like this [jealous] even less so, as a practitioner should follow the course of nature. If something is yours, you will not lose it. If something is not yours, you will not have it even if you fight for it. Of course, that is not absolute. If it were as absolute as that, there would not be the issue of committing wrongdoing. In other words, there are some unstable factors. ... We therefore believe in following the course of nature. Sometimes, you think that something should be yours, and others also tell you that it is yours. Actually, it is not. You may believe that it is yours, but in the end it is not yours. Through this, it can be seen whether you can give it up. If you cannot let it go, it is an attachment.” *Zhuan Falun*, Lecture Seven, “Jealousy,” 2000 edition.

28. “The goal that you intend to achieve is to practice cultivation toward high levels. The attachment of jealousy must be relinquished, so I have singled out the issue in this lecture.” *Zhuan Falun*, Lecture Seven, “Jealousy,” 2000 edition.

29. “Throughout history, or from the perspective of higher dimensions, the issues of one’s desire and lust have been very critical in determining whether one can practice cultivation. So we must really regard these things with indifference.” *Zhuan Falun*, Lecture Six, Attracting Demons in Qigong,” 2000 edition.

30. “As practitioners, in the course of cultivation there are so many attachments to be relinquished, such as the mentality of showing off [...] the competitive mentality,⁴ and zealotry. Many different attachments must be discarded, for the loss we discuss is one in a broad sense. During the entire course of cultivation, we should lose all everyday people’s attachments and various desires. *Zhuan Falun*, Lecture Four, “Loss and Gain,” 2000 edition.

The Metaphysical Realm

31. “All of the lives in this dimension are different from those in other dimensions of the universe. The lives in this dimension cannot see the lives in other dimensions or the truth of the universe. Thus, these human beings are actually lost in a maze.” Lecture One, Genuinely Guiding People Towards Higher Levels,” 2000 edition.

32. “The Great Enlightened Beings all have their own paradises to which they save people. These Tathagata Buddhas such as Sakyamuni, Buddha Amitabha, and the Great Sun Tathagata each have their own paradises for saving people.” Lecture Three, “the Buddha School Qigong and Buddhism,” 2000 edition.

33. “We cultivate Falun instead of dan. Falun is a miniature of the universe that possesses all of the universe’s capabilities, and it can operate and rotate automatically. It will forever rotate in the lower abdominal area. Once it is installed in your body,⁵ year-in and year-out it will not stop and will

⁴ “Competitive mentality” is the translation of the Chinese “zhendou”, which encompasses “fighting, arguing and competing.”

⁵ The use of the English term “body” does not refer merely to one’s surface body in this dimension but to our bodies that manifest in all dimensions. As *Zhuan Falun* explains “the mingmen point in the human body is an extremely important and major point. It is called “aperture” in the Tao School and “Pass” (*guan*) by us. It is a major pass which truly resembles an iron gate, and it has numerous layers of iron gates. It is known that a human body has many layers. Our physical cells are one layer, and the molecules inside are another. There is a gate placed at each layer of

forever rotate like this. While rotating clockwise, it can automatically absorb energy from the universe. [...] Also, it emits energy while rotating counter-clockwise, releasing undesirable elements that will disperse around your body. When it emits energy, the energy can be released to quite a distance, and then it will bring in new energy again. The emitted energy can benefit the people around you.” *Zhuan Falun*, Lecture One, “The Characteristics of Falun Dafa,” 2000 edition; ‘

34. The Primordial, Main and Assistant Spirits.

“The Primordial Spirit: This is sub-divided into the Main Spirit (zhu yuanshen) and the Assistant Spirit (fu yuanshen).” *Zhuan Falun*, Lecture One, “Zhen-Shan-Ren is the Sole Criterion to Discern Good and Bad People, 2000 edition.

“The Main Spirit [designates] one’s Main soul, Main Consciousness.” *Zhuan Falun*, Lecture One, “Zhen-Shan-Ren is the Sole Criterion to Discern Good and Bad People,” 2000 edition.

“From a high level, we find that when a person is dead, his Primordial Spirit does not become extinct. Why doesn’t the Primordial Spirit become extinct? In fact, we have seen that after a person is dead, his corpse in the mortuary is nothing but a body of human cells in our dimension. In this dimension, different cell tissues of the internal organs and all cells in the entire human body slough off, while in other dimensions the bodies made of particles more microscopic than molecules, atoms, protons, etc., are not at all dead. They exist in other dimensions and still live in the microscopic dimensions.” *Zhuan Falun*, Lecture Two, “Supernormal Abilities of Precognition and Retrocognition,” 2000 edition.

35. “De” (virtue).

“Let us talk about de. What specific connection does it have? We will analyze it in detail. As human beings, we have a body in each of numerous dimensions. When we examine the human body now, the largest elements are cells, and they comprise the physical human body. If you can enter the space between cells and molecules or the spaces among molecules, you will experience being in another dimension. What does that body’s form of existence resemble? Of course, you cannot use the concepts of this dimension to understand it, and your body must meet the requirement of that dimension’s form of existence. The body in another dimension can become big or small to begin with. At that time, you will find it also a boundless dimension. This refers to a simple form of other dimensions that exist simultaneously in the same place. Everyone has a specified body in each of many other dimensions. In a specified dimension there is a field that surrounds the human body. What kind of field is it? This field is the de that we have mentioned. De is a white substance and not, as we believed in the past, something spiritual or ideological—it absolutely has a kind of material existence [in another dimension].” Lecture One, “Why Doesn’t Your Gong Increase with Your Practice, 2000 edition.

atoms, protons, electrons, the very microscopic particles, the infinitesimal microscopic particles, and from the infinitely microscopic particles down to the extremely infinite microscopic particles. Therefore, there are numerous supernormal abilities and many special capabilities locked up inside the gates of different layers. Other practices cultivate dan. When dan is about to explode, the mingmen point must first be blasted open. If it is not blasted open, the supernormal abilities cannot be released. After the Mysterious Pass forms a system at mingmen point, it will again return inside the body. Then it returns to the lower abdominal area. This is called “the Mysterious Pass returning to the position.” Lecture 4, “The Mysterious Pass,” 2000 edition.

36. Karma (de and black karma).

“De (virtue) is a white substance [...] at the same time, there exists a black kind of substance that we call “karma” and Buddhism calls ‘sinful karma.’” These black and white substances exist simultaneously. What kind of relationship do these two substances have? We obtain that de through suffering, enduring setbacks, and doing good deeds; the black substance is accrued by committing bad deeds and doing wrong things or bullying people.” Zhuan Falun, Lecture One, “Why Doesn’t Your Gong Increase with Your Practice,” 2000 edition.

37. De and Gong.

“The gong that we attain through cultivating xinxing and assimilating to the characteristic of the universe evolves from our de. It determines the height of one’s level, the strength of one’s gong potency, and the Fruit Status of one’s cultivation.” (Lecture Three, “Supernormal Abilities and Gong Potency,” 2000 edition).

“We will address how de is transformed into gong. The community of cultivators has a saying: “Cultivation depends on one’s own efforts, while the transformation of gong is done by one’s master.” ... It is the master who actually does this, as you are simply unable to do it. ... A human body’s transformation process in other dimensions is quite intricate and complex. You cannot do such things at all.”

38. Reincarnation and Karma.

“Buddhism holds that one must go through samsara (the cycle of reincarnation) if one has not reached beyond [...] the three realms.” Zhuan Falun, Lecture One, note 6, 2000 edition. See also, Exhibit 3 ¶ 5.

“Resulting from past wrongdoing, one has illnesses or tribulations; suffering is repaying a karmic debt, and thus nobody can casually change this.” (Emphasis added.). Lecture One, “Guiding People Towards High Levels,” 2000 edition.

“A Buddha is mighty capable, and he could wipe out all of humankind’s illnesses with a wave of his hand. Why doesn’t he do it? Besides, there are so many Buddhas. Why don’t they show their mercy by curing your illness? It is because ordinary human society is supposed to be this way. Birth, old age, illness, and death are just such conditions. They all have karmic reasons and are of karmic retribution. You must repay the debt if you have it.” (Zhuan Falun, Lecture Seven, “Hospital Treatment and Qigong Treatment, 2000 edition);” [T]here is such a principle in the universe: Ordinary human affairs, according to the Buddha School, all have predestined relationships. Birth, old age, illness, and death exist as such for ordinary people. Due to karma resulting from past wrongdoing, one has illnesses or tribulations; suffering is repaying a karmic debt, and thus nobody can casually change this. Changing it means that one would not have to repay the debt after being in debt, and this cannot be done at will. Zhuan Falun, “Genuinely Guiding People to Higher Levels.” “The black substance is karma that can be eliminated through suffering” (Zhuan Falun Lecture Four, “Transformation of Karma,” 2000 edition).

“In other words, we must pay attention to cultivating “xinxing.” At the same time “xinxing” is cultivated, karma is eliminated and transformed into de so that you can ascend to a higher level; these go hand in hand.” Lecture Four, “Transformation of Karma,” 2000 edition.

39. “To understand these ‘supernormal’ things, one cannot apply everyday people’s deductive methods and their ways of understanding things. Lecture Nine, “Mind Intent,” 2000 edition.

Other Factors

40. Cultivators are not Monks or Nuns. “For those practitioners who practice cultivation among everyday people, our school of practice does not ask you to become a monk or nun. Young practitioners should still have families. So how should this issue be treated? I have said that our school of practice directly targets one’s mind. It does not make you actually lose anything in terms of material benefits. Instead, you are to temper your “xinxing” amidst the material benefits of everyday people. What is truly upgraded is your “xinxing.” If you can give up the attachment, you are able to abandon everything; when you are asked to give up material benefits, you will certainly be able to do it. If you cannot let the attachment go, you will not be able to discard anything. Therefore, the real purpose of cultivation is to cultivate your heart. The cultivation practices in temples force you to lose these things so as to get rid of this attachment of yours. By not letting you think about it, they force you to completely reject them; and they have adopted such a method. But we do not require you to do so. We ask you to care less about the material interests that lie right before you. [...] We do not ask you to become monks and nuns.” (Lecture Six, “Demonic Interference in Cultivation,” 2000 edition.

41. Illness and Cultivation

“Qigong practice and true cultivation practice will not lead to illness.” Lecture Six, “Cultivation Insanity,” 2000 edition.

“Can hospitals heal illnesses? Of course, they can. If hospitals could not heal illnesses, why would people believe in them and go there for treatments?” (Lecture Seven, “Hospital Treatment and Qigong Treatment,” 2000 edition).

42. Iconography. “The symbol of our Falun Dafa is Falun.” (Zhuan Falun, Lecture Five, the Falun Emblem, 2000 edition).

EXHIBIT 3

EXCERPTS OF SUPPLEMENTARY TEACHINGS OF FALUN GONG

1. “In fact, orthodox religions that have appeared in history in the world such as Christianity, Catholicism, Buddhism, Taoism, and including Judaism, could all enable the human heart to turn to goodness while, in the meantime, enabling those who genuinely wanted to move up in cultivation practice to attain the Fa and complete their cultivation practice.” “Lecture in Sydney,” 1996.
2. “Q: What does the Falun consist of? A: The Falun is an intelligent being consisting of high-energy substances. It transforms Gong (cultivation energy) automatically and it does not exist in our dimension.” Falun Gong, Chapter V, “Falun Law Wheel and Falun Gong,” 2001 edition.
3. Five Exercises. “Viewed broadly, Falun Dafa has a small number of exercise movements, yet the things to be developed are numerous and comprehensive. The movements govern every aspect of the body and the many things that will be developed. All five exercises in their entirety are taught to cultivators. Right from the outset, the areas in the cultivator’s body where energy is blocked will be opened, and a great amount of energy will be absorbed from the universe. In a very short period of time the exercises will expel useless substances from the person’s body and purify it.” The Great Way of Spiritual Perfection, Chapter I, “Five Exercises that are Easy and Simple to Learn,” 2014 edition.

Daily Study of Falun Gong scripture (called “FA Study”). “We don’t need to forbid you to do anything. Nor do we need to set any regulations for you to follow. Why? Because today we have passed on the Fa and this Fa already tells you what you should do. That’s why I say that if I’m not around or if you can’t see me, you should “take the Fa as teacher” and just study this Fa. Whether you succeed and whether you can do this is all determined by this Fa” “Suggestions Given at the Beijing Falun Data Association Meeting,” December 1994.

Local Group Study of Falun Gong scripture (called “FA Study”). “No matter how busy you may get, you still must study the Fa. This is why I am recommending that the Dafa disciples who are immersed in our various projects find time to participate in the local Fa-study. The reason is, in the preceding time, many a project asked me whether it would be alright for them to find time to study the Fa on their own, and so I have been observing, looking to see whether they could have a good handle on their own cultivation and meet the standard while not participating in the large group Fa-studies. The outcome, I found, was that they couldn’t. And not only didn’t they meet that standard, I found that they were stagnating; they were handling many things terribly; and many people were using human thinking to consider, view, and handle things, and falling behind in cultivation. I have seen the severity of this problem, and that is why I’m telling you that you had best still partake in the local Fa-study. Whatever the case, you must not slack off in your Fa-study, as this is the biggest problem, it’s a fundamental issue.” “

Prayer at Six-hour Intervals. “The Two Hand Positions for Sending Forth Righteous Thoughts.” [The prayers comprise the two verses “*fa jung chin Kwuhn shyer uh! Chew Myeh; fat jung then de. Sheen sheen baom.*” June 12, 2001, available at http://en.falundafa.org/eng/jjyz2_31.htm.

Proselytizing. “The second thing is that we need to make a priority of clarifying the truth. You need to know that clarifying the truth is extremely important for Dafa disciples. You aren’t just

doing personal cultivation--your own cultivation is saving the beings in the gigantic cosmic bodies that you represent. When you clarify the truth you are saving even more and even larger additional cosmic bodies and the beings in those cosmic bodies, because this is the responsibility Dafa and history have bestowed upon you [...] Of course, many students have been quietly doing large amounts of truth-clarifying work--passing out flyers, making phone calls, using the Internet, going to the consulates, and using all different forms of media to tell the world's people the truth about Dafa and to expose the evil's persecution." "Touring North America to Teach the Fa," March 2002.

4. Uncooked Meat. "So as for eating raw flesh foods, that's the worst. I remember that Yahweh told the people he created, "You should eat cooked food." For human beings, meat has to be cooked before it can be eaten." "Teaching the Fa in the City of Los Angeles," 2006.

Avoidance of Alcohol. The Buddha School does not permit drinking alcohol. Have you ever seen a Buddha carrying a wine container? No. I have said that one might not be able to eat meat, but after one gives up the attachment during cultivation practice among everyday people, it is not a problem for one to eat it again later. After quitting drinking alcohol, however, one should not drink again. Doesn't a practitioner have gong in the body? Different forms of gong and some supernormal abilities are shown on the surface of your body, and they are all pure. As soon as you drink alcohol, they will all leave the body immediately. In a split second, your body will have nothing left, as they all fear that odor. It is quite loathsome if you become addicted to this habit, for drinking alcohol can make one irrational. Why do some Great Taoist cultivation practices require drinking alcohol? It is because they do not cultivate one's Main Spirit, and drinking can make one's Main Spirit lose conscious.

Special Holidays. "May 13, 2017, is the 25th anniversary of Falun Dafa's public introduction and the 18th World Falun Dafa Day. Many cities and elected officials in the U.S. have issued proclamations declaring this May 13 'Falun Dafa Day' or sent greeting letters of congratulations to the event," available at <http://en.minghui.org/html/articles/2017/5/13/163639.html>.

The Falun Emblem. "Q. The direction in which the Falun rotates on the Falun emblem is not the same as the one on the student pass (referring to the first and second seminars). The Falun printed on the student pass for the seminar rotates counterclockwise. Why?" A: The goal is to give you something good. Its outward emission of energy adjusts everyone's body, so it does not rotate clockwise. You can see it rotating." Falun Gong, Chapter V, "Falun (Law Wheel" and Falun Gong," 2001 edition.

Iconographic Images of Buddhas, Taos, Boddhisatvas, and Celestial Maidens. "HongYin," a book of spiritual poems, features these images, as reflected in attachment one. These images are also on display at Falun Dafa Experience Sharing Religious Conferences.

5. "But for those who cultivate among ordinary people, we don't encourage you to go that route. If everyone cultivated in Falun Dafa and no one got married, then they wouldn't propagate future generations and human beings would become extinct. That wouldn't do." "Teaching the Fa and Answering Questions in Guangzhou," 1997.

6. "Since in the process of transmigration a person carries karma with him, the more wrongdoing a person does, the more karma he has. When he reincarnates into a plant the plant will be covered with karma. Human eyes can't see this, since karma exists in a dimension lower than the

layer of the largest molecules. Man reincarnates into plants, objects, animals, or he may even reincarnate into soil or stones when transmigrating, so karma is everywhere.” “Teaching the Fa at the U.S. Western Falun Dafa Conference,” 1999.

ATTACHMENT ONE



Buddha

Page 8 from Hong Yin (洪吟), ISBN 1-58613-052-8; URL:
<http://gb.falundafa.org/chigb/hongyin.htm#51>



Bodhisattva

Page 12 from Hong Yin (洪吟), ISBN 1-58613-052-8; URL:

<http://gb.falundafa.org/chigb/hongyin.htm#51>



Bodhisattva

Page 11 from Hong Yin (洪吟), ISBN 1-58613-052-8; URL:

<http://gb.falundafa.org/chigb/hongyin.htm#51>



Celestial maiden

Page 15 from Hong Yin (洪吟), ISBN 1-58613-052-8; URL:

<http://gb.falundafa.org/chigb/hongyin.htm#51>



Dao

Page 59 from Hong Yin (洪吟), ISBN 1-58613-052-8; URL:
<http://gb.falundafa.org/chigb/hongyin.htm#51>

EXHIBIT 4

EXCERPTS OF DEPOSITION OF LIJUN CAO

Page 1

1
2 UNITED STATES DISTRICT COURT
3 EASTERN DISTRICT OF NEW YORK
4 INDEX NO. 15-CV-1046
5 -----x
6 ZHANG Jingrong, ZHOU Yanhua, ZHANG Peng,
7 ZHANG Cuiping, WEI Min, LO Kitsuen, LI
8 Xiurong, CAO Lijun, HU Yang, GAO Jinying,
9 CUI Lina, XU Ting, and BIAN Hexiang,
10 Plaintiffs,
11 - against -
12 Chinese Anti-Cult World Alliance (CACWA),
13 Michael CHU, LI Huahong,
14 WAN Hongjuan, ZHU Zirou, and DOES
15 1-5 Inclusive,
16 Defendants.
17 -----x
18 October 19, 2016
19 3:15 p.m.
20 VIDEOTAPE DEPOSITION of LIJUN
21 CAO, taken by the Defendants, pursuant to
22 notice, held at the offices of Veritext
23 Legal Solutions, 1250 Broadway, New York,
24 New York, before Debbie Zaromatidis, a
25 Notary Public of the State of New York.

1

2 A P P E A R A N C E S:

3

4 HUMAN RIGHTS LAW FOUNDATION

5 Attorneys for Plaintiffs

6 1875 K Street, NW

7 Washington, D.C. 20036

8 BY: TERRI MARSH, ESQ.

9

10 CATAFAGO FINI, LLP

11 Attorneys for Defendants Chinese

12 Anti-Cult World Alliance, Michael Chu,

13 and Zhu Zirou

14 The Empire State Building

15 350 Fifth Avenue, Suite 7412

16 New York, New York 10118

17 BY: THOMAS M. FINI, ESQ.

18

19 ALSO PRESENT:

20 JAMES LING, Interpreter

21 DEVERELL WRITE, VIDEOGRAPHER

22 DANA CHAN

23

24

25

1 CAO

2 places do you go to practice the
3 exercises?

4 A. A park that is on the Botanical
5 Garden, which is very close to where I
6 live.

7 Q. And where do you live?

8 A. 83-55 Kissena Boulevard.

9 Q. And how do you get from where
10 you live to the park by the Botanical
11 Garden?

12 A. Yes. Well, it is very close to
13 where I live. From this block I cross to
14 another block and another block that was
15 the Botanical Garden.

16 Q. Right. And how do you
17 get -- how often did you go to the park by
18 the Botanical Garden to do the Falun Gong
19 exercises?

20 A. Well, it is difficult to say.
21 However, because I work three days a week,
22 so for the remaining four days sometimes I
23 go there three times, sometimes four
24 times, plus it is always better to
25 practice Falun Gong outside than indoors.

1 CAO

2 Q. Okay. And do you both find
3 that --

4 MR. FINI: Strike that.

5 Q. Do you find that doing Falun
6 Gong meditation gives you a sense of inner
7 piece?

8 A. Well, I cannot even describe how
9 I felt, the peace after I practice the
10 meditation. It gave a very, very nice
11 feeling of inner piece.

12 Q. So do you do meditations every
13 day?

14 A. Whenever time is available.

15 Q. And do you do it mostly every
16 day?

17 A. Well, if I have enough time
18 every day I would practice it.

19 Q. And on the typical week if you
20 take your average week, which has seven
21 days, on average how many days per week do
22 you do the meditations?

23 A. Four to five days.

24 Q. Okay. And because you practice
25 it, the meditations four or five days a

1 CAO

2 works as works that you've read?

3 A. I read this book Zhuan Falun
4 every day.

5 Q. And what about any of the other
6 works on that list? Have you read any of
7 those other books?

8 A. I can only tell you Zhuan Falun
9 I read it every day, but for other
10 occasionally I pick up some books but long
11 time ago. I don't even remember.

12 Q. Okay. Are you aware that Li
13 Hongzhi has taught that there were
14 separate heavens for separate races?

15 A. But people have different
16 religion though.

17 Q. What I am asking you is a yes or
18 no question. Are you aware that Li
19 Hongzhi has taught that there are separate
20 heavens for separate races?

21 A. I don't remember.

22 Q. You don't remember. If Master
23 Li did write that there are separate
24 heavens for separate races, would you
25 accept that as the truth because he wrote

1 CAO

2 would grab me.

3 Q. Okay. You're -- you're bigger
4 than Li Huahong, correct?

5 A. Well, let me ask you did you see
6 Li Huahong before.

7 Q. Yes, I have, but I am not
8 answering your questions. I am going to
9 ask my question again.

10 So here is my question. Are you
11 taller than Li -- wait. I have -- here
12 is my question. Are you taller than Li
13 Huahong?

14 A. Okay. Li Huahong, I am tell
15 taller than Li Huahong; however, I have to
16 tell you I believe in truthfulness,
17 compassion, forbearance. I would not hit
18 her. I want to continue.

19 Q. But wait. Hold on a second.

20 Didn't you make a gesture that
21 you went like this, that you smashed your
22 elbow to break free from her touch? Didn't
23 you show that on the video a couple of
24 minutes ago?

25 A. Is it my turn? Because she

1 CAO

2 Also they -- they question
3 about how many people actually died, how
4 many people actually injured as a member
5 of -- as members of Falun Gong. Now, I
6 can tell you exactly why I joined Falun
7 Gong. I was very sick before. My
8 master give me a second life.

9 Q. Okay. But do you think -- but
10 I want to ask you a question.

11 Do you think there is anything
12 wrong? Are you trying to stop with this
13 lawsuit those signs about Li Hongzhi's
14 houses and that there are less Falun Gong
15 hurt than they say there are? Are you
16 trying to stop them from saying those
17 things on the street?

18 A. Well, they did those types of
19 propaganda. I have no way I could
20 intervene with that action, but I did not
21 finish. Would you like me to continue?

22 Q. But if you are -- are you saying
23 that you are not trying to stop them from
24 holding up signs talking about Li
25 Hongzhi's houses? Are you saying you are

1 CAO

2 that?

3 A. I believe in my master. I
4 believe in every word that he said. I
5 believe.

6 Q. Okay. Do you believe that there
7 are separate heavens for separate races,
8 so that a white person has a different
9 heaven than a black person?

10 A. Well, I only believe in what my
11 master said. However, I did not know
12 anything about the question you asked.

13 Q. Okay. Would you be curious to
14 know that your master has said that there
15 is a separate heaven for white people and
16 a separate heaven for black people and a
17 separate heaven for Asian people.

18 Would you be curious to know
19 about that idea?

20 A. I am not curious at all, but I
21 believe in every word of my master.

22 Q. So even though your master said
23 it, you're not curious about what your
24 master says? Is that what your testimony
25 is?

1 CAO

2 Falun Gong activities and most of the time
3 you are traveling to those activities by
4 foot; is that correct?

5 A. Yes, very close to where I live.

6 Q. Okay. And has anyone -- has
7 any --

8 MR. FINI: Strike that.

9 Q. Has anyone ever stopped you from
10 traveling to any of the Falun Gong events
11 that you wanted to attend?

12 A. You mean in U.S. or in China?

13 Q. In the United States.

14 A. No, U.S. people are free.

15 Q. Okay. Do you engage in --

16 MR. FINI: Strike that.

17 Q. Has anyone in the United States
18 ever stopped you from practicing your
19 Falun Gong exercises or engaging in Falun
20 Gong prayer?

21 A. No. No person.

22 Q. Do you consider Falun Gong to be
23 a religion?

24 A. Yes, Falun Gong is a religion.

25 Q. Okay. And in the United States

1 CAO

2 that?

3 A. I believe in my master. I
4 believe in every word that he said. I
5 believe.

6 Q. Okay. Do you believe that there
7 are separate heavens for separate races,
8 so that a white person has a different
9 heaven than a black person?

10 A. Well, I only believe in what my
11 master said. However, I did not know
12 anything about the question you asked.

13 Q. Okay. Would you be curious to
14 know that your master has said that there
15 is a separate heaven for white people and
16 a separate heaven for black people and a
17 separate heaven for Asian people.

18 Would you be curious to know
19 about that idea?

20 A. I am not curious at all, but I
21 believe in every word of my master.

22 Q. So even though your master said
23 it, you're not curious about what your
24 master says? Is that what your testimony
25 is?

1 CAO

2 communicate about Falun Gong, and again
3 that is just a paraphrase. It's from my
4 notes.

5 So my question is a follow-up.

6 MR. FINI: Do you want to
7 translate that first?

8 MS. MARSH: Excuse me.

9 Q. Okay. Is -- when you -- when
10 you engage in fa zheng nian, is that part
11 of your religion? Do you do that as part
12 of your religion?

13 MR. FINI: Objection.

14 A. Yes. Yes.

15 Q. And when you give out religious
16 material, meaning material that talks
17 about the religion of Falun Gong, is that
18 part of your religion?

19 MR. FINI: Objection.

20 A. Yes.

21 Q. Okay.

22 A. I just did not express it aloud.
23 That's all. I don't have that chance.
24 That's all.

25 Q. Okay. Do you ---do you

EXHIBIT 5

EXCERPTS OF DEPOSITION OF MIN WEI

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - -x

ZHANG Jingrong, ZHOU Yanhua, ZHANG
Peng, ZHANG Cuiping, WEI Min, LO
Kitsuen, CAO Lijin, HU Yang, GUO
Xiaofang, GAO Jinying, CUI Lina,
XU Ting, BIAN Xexiang,

Plaintiffs,

-against-

CHINESE ANTI-CULT WORLD ALLIANCE
(CACWA) , Michael CHU, Li Xiurong,
Bian Hexiang, ZHU Ziwei, and DOES 1-5
Inclusive,

Defendants.

- - - - -x

1

2 DEPOSITION of MIN WEI, one of the
3 Plaintiffs in the above-entitled action,
4 held at the above time and place, taken
5 before Gretchen A. Milton, a Shorthand
6 Reporter and Notary Public of the State of
7 New York, pursuant to the Federal Rules of
8 Civil Procedure, Notice and stipulations
9 between Counsel.

10 * * *

11

12 APPEARANCES:

13

HUMAN RIGHTS LAW FOUNDATION

14

Attorneys for Plaintiffs
1615 L Street, NW, Suite 1100
Washington, D.C. 20036

15

16 BY: TERRI ELLEN MARSH, ESQ.

17

18 CATAFAGO FINI, LLP

Attorney for Defendants
Chinese Anti-Cult World Alliance
Michael Chu

19

20 Li Xiurong
Zhu Zirou

20

21 The Empire State Building
350 Fifth Avenue, Suite 7412
New York, New York 10118

21

22

23 BY: TOM M. FINI, ESQ.

24

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APPEARANCES:
(Continuing)

ALSO PRESENT:

ARTHUR KWOK,
Mandarin Language Interpreter
(Official Interpreter for this
Deposition)
EIBER TRANSLATION, INC.

DEVERELL WRITE,
Videographer,
VERITEXT LEGAL SOLUTIONS

JANET CHIU,
Mandarin Language Interpreter
HUMAN RIGHTS LAW FOUNDATION
YI YANG XIA
(A.M. Session Only)
* * *

1 MIN WEI

2 also gives her a feeling of tranquility?

3 A. Not only does she tell me it
4 brought her tranquility by practicing it,
5 she also said that it brought her back
6 from the edge of being... of being... of
7 death.

8 Q. And how often today, meaning in
9 the present time, how often during the
10 week do you meditate using Falun Gong
11 practices?

12 A. As long as we are free, we
13 practice it every day.

14 Q. And when you say "as long as we
15 are free," do you mean as long as you have
16 time in the day, given your work schedule?

17 A. Yes.

18 Q. So, on an average, if you take an
19 average week today, during your current
20 life, on average, during the week, how
21 many hours do you meditate?

22 THE INTERPRETER: Wait -- wait.

23 A. Well, we have five movements or
24 five exercises. So, we can all do that
25 within an hour. Okay. For meditation,

1 MIN WEI

2 you need it, one hour, to do that. But
3 there are four other exercises or
4 movements that together only require one
5 hour.

6 Q. So, on a typical week, during the
7 present time in your life, do you spend
8 one hour a week on average, two hours,
9 five hours, ten hours?

10 I'm trying to get an overall
11 sense, during the week all together, if
12 you added the hours up during the week,
13 how many hours do you spend doing Falun
14 Gong mediation and exercises?

15 A. About one hour per day.
16 Sometimes if I have extra time, two hours
17 per day.

18 Q. So, about one to two hours per
19 day; correct?

20 A. Yes.

21 Q. And you find that it currently
22 gives you a sense of tranquility; is that
23 correct?

24 A. Yes. Very much so.

25 Q. So, you're generally, as result

1 MIN WEI

2 Q. Do you go to the Spiritual Center
3 in Flushing?

4 A. Yes. I pass by every day.

5 Q. Do you interact with other Falun
6 Gong practitioners at the Spiritual Center
7 in Flushing?

8 A. Yes. Yes, we interact.

9 Q. And do you interact with Falun
10 Gong practitioners at the Spiritual Center
11 almost every day?

12 A. No.

13 Q. How many times a week?

14 A. Once, possibly, per week.

15 Q. But do you pass by the Spiritual
16 Center more than once a week?

17 A. Yes.

18 Q. And when you go to the Spiritual
19 Center in Flushing, how do you get there?

20 A. I walk over.

21 Q. How far is it from where you
22 live?

23 A. Twenty minutes by walking.

24 Within 20 minutes.

25 Q. And when is the last three times

1 MIN WEI

2 you went to the Spiritual Center in
3 Flushing?

4 A. Okay. Can I have the question
5 again?

6 Q. What is the last three times you
7 went to the Spiritual Center in Flushing?

8 A. Okay. The last one was two weeks
9 ago, I went once. And I don't remember --
10 okay -- I don't remember when I went the
11 other two times.

12 But we also have a lot of tables
13 in Flushing on location. Five... okay.
14 Five spiritual tables or advertising
15 tables. And every week we have a lot of
16 members, Falun Gong members, who go to
17 Taiwan Center to learn the spiritual
18 teachings, rules, scriptures from
19 Teacher Li.

20 Q. When's the last time you went to
21 the Taiwan Center?

22 A. Most recent one for myself was
23 half a year ago that I went to Taiwan
24 Center.

25 Q. Why haven't you gone there more

1 MIN WEI

2 Center?

3 A. I don't know. I just know they
4 coordinate some activities. I was not --
5 I did not care or look into who was the
6 leader.

7 Q. I didn't ask you if you can care.
8 I am tired of your not answering my
9 questions. You have an organization
10 called Falun Gong. It's an
11 organization --

12 MS. MARSH: Objection.

13 Q. -- correct?

14 MS. MARSH: Objection.

15 A. I don't know how they are
16 organized. I just know they have someone
17 to coordinate activities.

18 Q. Right. Like when you wanted to
19 go to Barclays; right?

20 A. I'm not sure I understand what
21 you mean by that.

22 Q. Yeah. You went to Barclays to
23 see the master; right?

24 A. Prior to attending Barclays, we
25 had no idea whether he was going to be

1 MIN WEI

2 there. We merely went there to have a
3 meeting. No idea whether master would
4 show or not.

5 Q. But you knew he might show up;
6 right?

7 A. Yes. Possible. But I don't
8 know. Can't be sure.

9 Q. Right. But a minute ago, you
10 said you had no idea whether he'd show up.
11 And now you just admitted that --

12 MS. MARSH: Objection.

13 Q. -- of course you know he was
14 probably going to show up?

15 MS. MARSH: Objection.

16 A. I just said that I have no idea.
17 Don't know whether he will appear or
18 attend, or not. I don't know the
19 difference between the Chinese and the
20 English expressions.

21 Q. Yeah. Well, when you wanted to
22 go to Barclays, you testified earlier that
23 you had to get -- you had to talk to
24 somebody to go. You can't just go.

25 The general public can't just go;

1 MIN WEI

2 Gong. You can openly practice it here.

3 Q. Okay. So, give me some examples
4 as to how presently, in the present, you
5 and your wife publicly practice Falun
6 Gong.

7 A. These days we can go with other
8 people to the park and practice Falun Gong
9 there.

10 Q. Which park do you go to?

11 A. The Kissena Park.

12 Q. Where is that located?

13 A. I only know that... I only know
14 that it's in Flushing, next to Main
15 Street.

16 Q. Do you own a car?

17 A. No.

18 Q. How do you get from where you
19 live to the park you're describing?

20 A. Walk over.

21 Q. How long does it take you to
22 walk?

23 A. About 15, 20 minutes.

24 Q. How often do you go with your
25 wife to --

1 MIN WEI

2 MR. FINI: Strike that.

3 Q. How often do you go to that park,
4 on an average month, to practice Falun
5 Gong?

6 A. These days? These days, it's
7 possible I just go once a month.

8 Q. Did you use to go more
9 frequently?

10 A. Yes. More frequent, when I first
11 arrived in the states.

12 Q. Why is it less frequent now?

13 A. Because of the work that I have
14 that is different in nature. And also
15 need to take care of the kids.

16 Q. Okay. And in addition to going
17 to the park, are there other places that
18 you and your wife go to practice Falun
19 Gong?

20 A. During activities, events, we
21 also went to locations to practice Falun
22 Gong.

23 Q. Which locations?

24 A. Central Park one time, for
25 example.

1 MIN WEI

2 Q. Who chooses who the coordinator
3 is?

4 A. I don't know. But in Chinese, if
5 they want to use "cult" in Chinese, that
6 is not acceptable.

7 Q. Who chooses who the coordinator
8 is?

9 A. I don't know.

10 Q. Sounds a lot like the Communist
11 Party. Secret decision making. No
12 democracy. Bring on this lawsuit. Bring
13 it on. Let's roll.

14 A. It's not a government.

15 Q. All right.

16 MR. FINI: I have no further
17 questions.

18 A. (Continuing) We're not a
19 government. It's a religion.

20 Q. Okay.

21 MR. FINI: I have no further
22 questions.

23 THE COURT REPORTER: Do you have
24 any further questions, ma'am?

25 MS. MARSH: No, I don't.

1 MIN WEI

2 A. I just, I just believe.

3 Q. You just believe it because
4 Li Hongzhi wrote it?

5 MS. MARSH: Objection.

6 A. Before I became Falun Gong, I
7 already believed aliens. I already
8 believed that aliens came to Earth.

9 Q. And what was the basis? What led
10 you to believe that?

11 A. Well, as I mentioned before, lots
12 of people talk about it, including NASA.
13 NASA had mentioned it as well.

14 Q. So, you believe that NASA -- the
15 United States entity called NASA -- your
16 understanding is they maintain that aliens
17 visited us within the last 200 years?

18 A. Everybody had discussed -- had
19 discussions about it; that aliens had
20 visited Earth. I merely just believe it.

21 Q. Okay. Is it your understanding
22 that NASA believes aliens have visited
23 Earth? Is that your understanding of
24 NASA?

25 A. I don't know. That I don't know.

Page 162

1 MIN WEI

2 disseminate could cause hatred from the
3 people in Flushing. And would cause them
4 to use violence to destroy Falun Gong.
5 And they use languages like they want to
6 kick Falun Gong out of the community,
7 local community. My son was attacked by
8 them. Was really afraid. Scared.

9 They had a table there
10 continuously, season after season,
11 disseminating materials that could cause
12 violence. And for people who doesn't know
13 the truth, it could cause people to
14 misunderstand and create hatred. And it
15 causes a feeling of loss of safety in the
16 community. I want it to end, such an
17 environment and situation, so that I could
18 freely practice Falun Gong in my own
19 community, in my local community, freely,
20 without fear.

21 Q. Are you -- so, you are seeking to
22 stop the defendants from distributing the
23 materials that you find offensive?

24 MS. MARSH: Objection to the
25 form.

1 MIN WEI

2 Q. What color are the pamphlets that
3 you've seen?

4 A. I don't remember exactly. But
5 all kinds of color. Green. Yellow.
6 White color. Several other colors. I
7 don't remember exactly. Because after
8 reading it, I realized what kind of
9 material, and I didn't read it again.

10 Q. When was the last time you read a
11 specific pamphlet that you think Michael
12 Chu disseminated?

13 A. 2014. 2013. Exactly when, I
14 don't remember. Possibly 2013 as well. I
15 have seen it in 2013 as well.

16 Q. Other than the two incidents you
17 mentioned, that you have described today,
18 any other physical incidents that you
19 suffered; that you allegedly suffered?

20 A. Not on -- not -- not against me.
21 Not against me. However, these two
22 incidents are sufficient to strike fear in
23 me. I am already very scared from these
24 two incidents. And I am afraid to imagine
25 what else could happen.

Page 280

1 MIN WEI
2 know, just "cult" as opposed to "evil
3 cult" or "dangerous cult"?
4 MR. FINI: Objection.
5 THE INTERPRETER: You know
6 what --
7 (The requested portion of the
8 record was read.)
9 Q. Let me make it easier. Is there
10 one word? That's the point. Is there one
11 word that just says "cult"?
12 MR. FINI: Objection.
13 A. To use one word to express --
14 Q. Just "cult."
15 A. -- "cult"? I am not sure --
16 Q. Okay.
17 A. -- how to use one word to express
18 cult.
19 Q. Okay. That's fine. I just
20 thought maybe there would.
21 Okay. So, do you -- you do still
22 travel in Flushing. As you have
23 testified, you walk. You take the subway.
24 You visit the Falun Gong spiritual sites.
25 You go to the Falun Gong Spiritual Center.

Page 281

1 MIN WEI
2 When you do this, do you still
3 feel afraid that one of the defendants
4 might confront or threaten you?
5 MR. FINI: Objection.
6 A. Yes, yes. Very much afraid.
7 Q. Another question related to this
8 is you spoke a lot about the inner calm
9 that you feel, the tranquility that you
10 feel from the meditation exercises, the
11 five movements, and, more generally, from
12 the practice of Falun Gong.
13 Does this tranquility eliminate
14 all fear?
15 MR. FINI: Objection.
16 A. No.
17 Q. There was quite a bit of
18 testimony in response to questions
19 about -- in quotes -- "unusual beliefs" of
20 the Falun Gong religion. And do you
21 remember these questions?
22 A. Yes.
23 Q. In your answers, you repeatedly
24 showed how the so-called "unusual beliefs"
25 in Falun Gong were very similar to unusual

EXHIBIT 6

EXCERPTS OF DEPOSITION OF JINYING GAO

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF NEW YORK

INDEX NO. 15 CV 1046

-----x

ZHANG Jingrong, ZHOU Yanhua, ZHANG Peng,
ZHANG Cuiping, WEI Min, LO Kitsuen, LI
Xiurong, CAO Lijun, HU Yang, GAO Jinying,
CUI LINA, XU Ting, and BIAN Hexiang,
Plaintiffs,

- against -

Chinese Anti-Cult World Alliance (CACWA),
Michael CHU, LI Huahong,
WAN Hongjuan, ZHU Sirou, and DOES
1-5 Inclusive,

Defendants.

-----x

VIDEOTAPE DEPOSITION of the
Plaintiff JINYING GAO, held at the offices
of Beldock Levine Hoffman & Goodman, LLP,
pursuant to Notice, before Debbie
Saromatidis, a Notary Public of the State
of New York.

1

2 A P P E A R A N C E S:

3

4 HUMAN RIGHTS LAW FOUNDATION

5 Attorneys for Plaintiffs

6 1615 L Street, NW, Suite 1100

7 Washington, D.C. 20036

8 BY: TERRI MARSH, ESQ.

9

10 CATAFAGO FINI LLP

11 Attorneys for Defendants Chinese Anti-Cult

12 World Alliance, Michael Chu, Li Huahong

13 and Zhu Zirou

14 The Empire State Building

15 350 Fifth Avenue, Suite 7412

16 New York, New York 10118

17 BY: TOM M. FINI, ESQ.

18

19

20 ALSO PRESENT:

21 ARTHUR KWOK, MANDARIN INTERPRETER

22 DANA CHENG, MANDARIN INTERPRETER

23 JONATHAN POPHAM, Videographer

24

25

1 GAO

2 Chinese word that she is using?

3 Q. Struggle with what?

4 THE INTERPRETER: Xia jiao.

5 A. Both in China all the Chinese
6 understand that word xia jiao are words
7 that insight violence. I don't really
8 care if they use anything else. I want to
9 speak other words. That is their
10 freedom. That is up to them.

11 Q. Okay. Do you engage in
12 meditation practice, Falun Gong meditation
13 practice or exercise?

14 A. Yes.

15 Q. Do you do that every day?

16 A. Yes. I practice the movement
17 on a daily basis.

18 Q. Does the meditation and exercise
19 make you feel peaceful?

20 A. Correct. That's correct. It
21 gives me a peace of mind.

22 Q. Are you -- as a result of that
23 meditation practice, are you generally a
24 happy peaceful person?

25 A. Yes, correct.

1 GAO

2 Wong.

3 Q. Okay. And how did you get
4 introduced to Falun Gong?

5 A. I believe they attended sifu's
6 classes, and they learned it there, and
7 then they first taught it to me after
8 that. So they want me to teach it to
9 others.

10 Q. Okay. So when were you first
11 introduced to Falun Gong?

12 A. December 1994.

13 Q. How did you get introduced in
14 December 1994? What happened?

15 A. We were neighbors, and that
16 person said why don't you practice Falun
17 Gong. It's pretty -- it's very good.

18 Q. And what happened next in terms
19 of your introduction to Falun Gong?

20 A. After that I started practicing
21 Falun Gong.

22 Q. Did you read any books or
23 literature by Li Hongzhi?

24 A. Yes. I have read them, yes.

25 Q. When you first got introduced in

Page 16

1 GAO
2 1994, did you read a book by him?
3 A. Yes. At the time the person
4 with the last name Wong gifted one to me.
5 Q. What was the --
6 A. Gave me one.
7 Q. What was the name of it?
8 A. It was the first edition of the
9 Zhuan Falun. Zhuan Falun.
10 Q. Okay. Did you read that in
11 1994?
12 A. In '94 I read the book Falun
13 Gong. In either January or February, I
14 don't remember exactly, I was given a copy
15 of Zhuan Falun.
16 Q. And how many times between then
17 and now have you read those books that you
18 just identified?
19 A. I don't remember exactly. I
20 would read it when I had free time.
21 Q. Okay. Have you read those books
22 more than four times?
23 A. Yes.
24 Q. More than ten times?
25 A. I don't remember.

Page 17

1 GAO
2 Q. Okay. Have you read any other
3 works or writings by Li Hongzhi?
4 A. I have read some and not read
5 others.
6 Q. Have you read anything he has
7 written that you don't agree with or that
8 you are skeptical of?
9 MR. MOSKOVITZ: Objection.
10 A. No.
11 Q. So every word he has written you
12 agree with?
13 MR. MOSKOVITZ: Objection.
14 Mischaracterizes her testimony.
15 Q. So every word he has written you
16 agree with. Is that the case?
17 MR. MOSKOVITZ: Objection.
18 A. Yes, I agree with them all.
19 Q. Have you -- are you aware that
20 Li Hongzhi has said that he has visited
21 aliens?
22 MR. MOSKOVITZ: Objection.
23 A. I don't remember.
24 Q. Well, do you know what an alien
25 is?

1 GAO

2 So the meditation practice, does
3 your husband also do meditation practice
4 with you?

5 A. That is correct. Sometimes we
6 do it together, sometimes separately, and
7 any free time I would meditate.

8 Q. Okay. And has your Falun Gong
9 practice with her husband actually helped
10 your marriage be a happy marriage?

11 A. Correct.

12 Q. And do you and your husband
13 sleep well at night meaning peacefully,
14 calm sleep, uninterrupted sleep?

15 A. Correct.

16 Q. Okay. How often do you go to
17 the Taiwan Center?

18 A. Generally speaking once a week.

19 Q. Okay. How many people
20 approximately are at the Taiwan Center
21 when you go?

22 A. Approximately 200 or so. I
23 don't know the exact number of attendees.

24 Q. Okay. Do you travel outside of
25 New York City for Falun Gong events?

1 GAO

2 that you distribute?

3 A. Well, it does have writings
4 about Falun Gong, truth, kindness and
5 beauty.

6 Q. Have you --

7 A. As well as -- and also
8 instructions on how to meditate, how to
9 practice Falun Gong.

10 Q. Have you ever heard Li Hongzhi
11 say that China, the Country of China has
12 suffered things like earthquakes because
13 of the bad deeds of the Chinese
14 government?

15 MR. MOSKOVITZ: Objection.

16 A. No, I have not heard that.

17 Q. Do you think that the geography
18 of China has suffered things like
19 earthquakes to punish for the bad actions
20 of the Chinese government?

21 A. Well, my understanding is that
22 when humans do bad deeds they get bad
23 karma and including us. As long as one
24 does bad deeds it brings bad karma. We
25 practice and meditate to get rid of bad

1 GAO

2 question, and she answered your question.

3 If you don't like that, you can call the

4 magistrate.

5 MR. FINI: I have a problem

6 with your interruption.

7 Q. Do you understand what the word

8 god means? A god, do you understand what

9 that means?

10 MR. MOSKOVITZ: Objection.

11 A. We practice towards God,

12 religion, believe in God, so --

13 Q. Do you believe that Li Hongzhi

14 has supernatural powers?

15 MR. MOSKOVITZ: Objection.

16 A. I believe yes.

17 Q. What kind of supernatural powers

18 does he have?

19 MR. MOSKOVITZ: Objection.

20 A. The Fa theory he taught were

21 very deep.

22 Q. Can he fly?

23 MS. MOSKOVITZ: Objection.

24 A. I have not witnessed it.

25 Q. Have you heard that he can

1 GAO

2 the original writing. Possibly I read it
3 in the New York Times that he did say
4 aliens have visited.

5 Q. Do you think aliens have visited
6 earth?

7 A. I lack the knowledge, so --

8 Q. What about --

9 A. I lack the knowledge. I can't
10 really say. I don't really know.

11 Q. But what about if Li Hongzhi
12 said it is so, does that make it so?

13 MS. MARSH: Objection.

14 A. If sifu has said it, I would
15 believe it.

16 Q. Why -- why aren't you willing to
17 disagree with anything -- with anything he
18 says?

19 MR. MOSKOVITZ: Objection.

20 MS. MARSH: Objection.

21 A. Because I respect him. He is
22 the most respected person for me.

23 Similarly like Christians who respect
24 Jesus Christ.

25 Q. Well, you know, in Christian

Page 42

1 GAO

2 Q. Okay. And after you got out
3 and before your second arrest, what did
4 you do with your life if you weren't able
5 to work?

6 A. After I returned home, they sent
7 four people to watch over me and
8 was -- they kept me under watch 24 hours a
9 day. If I go out shopping, for example,
10 two of them would walk alongside me beside
11 me, and if another person who also
12 practices approached me that person would
13 be arrested immediately. I was home
14 under surveillance for eight days, and two
15 fellow practitioners came to visit and was
16 arrested. After eight days I avoided the
17 surveillance of these people, and I
18 escaped. After that I basically was
19 homeless, no where to go.

20 Q. Did you live with your husband?

21 A. No. Well, there were five of
22 us, four others and myself. So five of us
23 fellow practitioners we stayed together.
24 We lived together. We escaped to
25 different locations. We moved do

Page 43

1 GAO

2 different locations, and in less than a
3 year two fellow practitioners were
4 arrested, and they were persecuted to
5 death. One -- one of the -- his name is
6 Wong Sing Zung, he was only 23 years old,
7 and another person's name is Wong Fung
8 Wei. Wong Sing Zung was beaten to death
9 seven days after he was arrested. Wong
10 Fung Wei after a few months was beaten to
11 death.

12 Q. How do you know?

13 A. They were fellow practitioners
14 who I rely on a day-to-day basis that we
15 survive together.

16 Q. How do you know they were beaten
17 to death?

18 A. Because we were together, and
19 then at night that person went out and put
20 up some Falun Gong posters -- posters.
21 After Wong Sing Zung was arrested one
22 person escaped and told me about it.

23 MR. FINI: Ask her if we should
24 take a break.

25 MR. MOSKOVITZ: Let's take a

Page 54

1 GAO

2 United States to do whatever you want with
3 respect to Falun Gong practice?

4 MR. MOSKOVITZ: Objection.

5 A. Yes.

6 Q. The meetings -- when you gave
7 that list you said meetings. Where are
8 these meetings that you referred to?

9 A. Manhattan as well as Brooklyn, a
10 facility -- a hall, a big hall in Brooklyn
11 there were meetings.

12 Q. Is one of the meetings you are
13 referring to at the Barclay's Center? It's
14 a very big complex.

15 A. Yes. Yes.

16 Q. And Li Hongzhi appeared there;
17 is that correct?

18 A. Yes.

19 Q. And you attended that; is that
20 correct?

21 A. I did.

22 Q. Okay. Approximately when was
23 that?

24 A. For this year approximately it
25 was around May, June.

Page 55

1 GAO

2 Q. And how many people
3 approximately were at that meeting?

4 A. I don't know. It was full
5 attendance.

6 Q. So would it be safe to say that
7 there were thousands of people attending?

8 A. I don't really know exactly how
9 many people, but the entire whole place
10 was filled up.

11 Q. The entire hall in Barclay's
12 Center, correct?

13 A. Yes.

14 Q. And was the room you were in
15 like a gigantic room that would be for a
16 concert or a sporting event? Could you
17 describe the room?

18 A. I don't really know, but it is a
19 flat space with level seats on all three
20 sides.

21 Q. Right. But to give -- just to
22 make clear the size, it was far, far
23 bigger than the room we are sitting in
24 today, correct?

25 A. Yes. It -- it is a stadium of

1 GAO

2 Q. Right, but those are tables in
3 the public street that anybody could walk
4 by, correct?

5 A. Yes.

6 Q. Okay. And how often do you
7 visit those tables on Main Street,
8 Flushing?

9 A. Generally I go there three times
10 a week.

11 Q. Okay. And how do you get
12 to -- how do you get there from your home?

13 A. I take -- I take the subway
14 from -- I take the F and then the 7 train,
15 transfer to the 7.

16 Q. Okay. Is it true that unlike in
17 China you and your friends who practice
18 Falun Gong can do and say whatever you
19 want about Falun Gong here in the United
20 States?

21 MR. MOSKOVITZ: Objection.

22 A. Yes.

23 Q. Do you know who Michael Chu is?

24 A. Michael Chu. Michael Chu
25 what -- what is his Chinese name?

1 GAO

2 assault any of the defendants I've just
3 mentioned?

4 A. No.

5 MS. MARSH: Okay.

6 That's -- nothing further.

7 MR. MOSKOVITZ: Xie xie.

8 MS. MARSH: Yes. Xie xie.

9 Thank you.

10 MR. FINI: Are you done?

11 MS. MARSH: Yes.

12 MR. FINI: Okay. I have some
13 follow-up questions.

14 EXAMINATION BY MR. FINI:

15 Q. You testified earlier today that
16 you and your husband go to whatever Falun
17 Gong activities that you wish to go to,
18 correct?

19 MR. MOSKOVITZ: Objection.

20 A. Yes.

21 Q. Okay.

22 A. If I want to go, I could go.

23 Q. Right, and you go to any that
24 you feel like going to, correct?

25 A. Yes. If anybody inform

1 GAO

2 me -- if they inform me and I am able to
3 go I want to. I could go. I would go.

4 Q. Okay. And you come and go AS
5 you please to anywhere you want in Main
6 Street, Flushing, correct?

7 A. Yes, I am able to go in and out
8 freely. However, however, I would be
9 scared though. As a Falun Gong, I
10 shouldn't abandon my beliefs because of
11 fear.

12 Q. I understand. So to be clear,
13 despite the fear you come and go to all
14 the Falun Gong events you want to,
15 correct?

16 A. Yes, if I choose to go I could
17 go. I would go.

18 Q. Right. And you go to any that
19 you want to go, correct?

20 MR. MOSKOVITZ: Objection.
21 That is literally the third time you've
22 asked that question in a row. Do you
23 have a different question? I am
24 instructing her not to answer this. You
25 asked her two or three other times in this

1 GAO

2 Q. Yes. So the next line of
3 questions I am going to ask will be for
4 the year August 2015 to August 2016; in
5 other words, approximately the last twelve
6 months.

7 A. Okay. What are you asking me
8 2015, 2016?

9 Q. I am about to. I am about to
10 ask some questions.

11 A. Okay.

12 Q. What types of Falun Gong
13 activities have you participated in during
14 the last twelve months?

15 A. I attended the meetings. I
16 participated or attended the parades.

17 Q. What else?

18 A. And every week I also
19 participate in learning the movement or
20 teachings, and I volunteer at the table
21 giving out information, handing out
22 fliers.

23 Q. Okay. And is it true that in
24 the United States including the last year,
25 the last twelve months you are free in the

1 GAO

2 has written that Falun Gong is not a
3 religion?

4 MR. MOSKOVITZ: Objection.

5 A. Well, my understanding is that
6 in China it is not a religion. Religions
7 have a temple. We don't have a facility
8 like that, like a temple, like a church.
9 Well, in the States, we are a religion
10 because we have gatherings. We learn the
11 movements or the teachings, and we also
12 have writings, scriptural writings.

13 Q. But the writings exist in China
14 too, don't they?

15 MR. MOSKOVITZ: Objection.

16 A. What do you mean by that?

17 Q. The books, Li Hongzhi books
18 are --

19 A. I don't have that book that's in
20 your hand. What is that book that's in
21 your hand?

22 Q. I am not referring to any
23 specific book. What I am saying is --

24 MR. FINI: Translate that so
25 far.

EXHIBIT 7

EXCERPTS OF DEPOSITION OF YANHUA ZHOU

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
INDEX NO. 15 CV 1046

-----X
ZHANG Jingrong, ZHOU Yanhua, ZHANG Peng,
ZHANG Cuiping, WEI Min, LO Kitsuen, LI
Xiurong, CAO Lijun, HU Yang, GAO Jinying,
CUI Lina, XU Ting, and BIAN Hexiang,
Plaintiffs,

- against -

Chinese Anti-Cult World Alliance (CACWA),
Michael CHU, LI Huahong,
WAN Hongjuan, ZHU Zirou, and DOES
1-5 Inclusive,
Defendants.

-----X

October 13, 2016

9:50 a.m.

VIDEOTAPE DEPOSITION of ZHOU

Yanhua, taken by the Defendants, pursuant
to notice, held at the offices of Veritext
Legal Solutions, LLP before
Debbie Zaromatidis, a Notary Public of the
State of New York.

1

2 A P P E A R A N C E S:

3

4 HUMAN RIGHTS LAW FOUNDATION

5 Attorneys for Plaintiffs

6 1615 L Street, NW, Suite 1100

7 Washington, D.C. 20036

8 BY: TERRI MARSH, ESQ.

9

10 CATAFAGO FINI LLP

11 Attorneys for Defendants Chinese

12 Anti-Cult World Alliance, Michael Chu,

13 and Zhu Zirou

14 The Empire State Building

15 350 Fifth Avenue, Suite 7412

16 New York, New York 10118

17 BY: THOMAS M. FINI, ESQ.

18

19

20 A L S O P R E S E N T:

21 KEVIN GALLAGHER, Videographer

22 ANNIE LEE, Videographer

23 HUA DU

24

25

1 ZHOU

2 the United States from 2009, is it correct
3 that you have been completely free to
4 practice Falun Gong?

5 A. Yes, in U.S.

6 Q. Can you please describe the
7 different ways week to week that you go to
8 Falun Gong locations or practice Falun
9 Gong as a general matter week to week?

10 Could you describe your Falun Gong
11 practice?

12 A. We have a location to practice
13 Falun Gong, so every day we went there.

14 Q. Where is this location?

15 A. Kissena Park.

16 Q. And how often do you go to
17 Kissena Park to practice Falun Gong?

18 A. Every day. Very often.

19 Q. Okay. Did you go to Kissena
20 Park --

21 MR. FINI: Strike that.

22 Q. What year after you -- after you
23 came to the United States, what year did
24 you start to go to Kissena Park on a daily
25 basis?

1 ZHOU

2 A. Well, at the the beginning we
3 had practiced in Botanical Garden.

4 Q. Okay. So when you came to the
5 United States in 2000 -- 2009. When you
6 came to the United States in 2009, where
7 did you start to practice Falun Gong,
8 which park?

9 A. I mentioned to you at the
10 beginning we practice in Botanical Garden.

11 Q. Okay. And when you -- in 2009
12 in addition to the Botanical Garden, did
13 you also go to the Taiwanese Cultural
14 Center?

15 A. Well, we have various locations
16 for practice -- for practice. The reason
17 is some of these locations we rented. So
18 sometime, you know, we found that
19 this -- this location not practical, and
20 then we will move on to another one. So
21 there were various locations.

22 Q. In 2011, what locations and
23 parks were you going to to practice Falun
24 Gong?

25 A. 2011 Botanical Garden.

Page 88

1 ZHOU

2 Q. And did you go anywhere else to
3 participate in Falun Gong events?

4 MS. MARSH: Objection.

5 A. Yes, other -- I participated in
6 other Falun Gong activities.

7 Q. Where? Where were they located?

8 A. Too many locations. Too many.

9 Q. Name some that come to mind.

10 A. You mean activities, right, not
11 just practice? Not just practice --

12 Q. Everything. All of them.

13 A. We have a new year parade
14 annually.

15 Q. Okay.

16 Q. What else?

17 A. We have another parade -- parade
18 in April 25 we call fall 25 parade each
19 year.

20 Q. What else?

21 A. Also we have activities in May.

22 Q. What about the five tables on
23 Main Street?

24 A. Yes.

25 Q. Did you -- in 2011, did you from

Page 89

1 ZHOU

2 time to time go to those five tables on
3 Main Street?

4 A. Yes. Yes.

5 Q. What about what some people call
6 the spiritual center near the library? Did
7 you go to the spiritual center near the
8 library?

9 A. Yes.

10 Q. Okay. And in 2011, how would
11 you typically get to those various
12 locations that you just identified? So,
13 for example, let's take the five tables.
14 How would you get from your home to the
15 five tables?

16 A. By bike.

17 Q. Okay. And in 2011, how would
18 you get to the spiritual center by the
19 library?

20 A. By bike.

21 Q. What about the Botanical Garden,
22 how would you get to the Botanical Garden?

23 A. Same, by bike.

24 Q. Bike. And in 2011 for that
25 year, were you at all times perfectly free

1 ZHOU

2 explained.

3 Q. But the reality is that there
4 are a lot of people who simply think there
5 is not enough evidence to conclude, to
6 actually know for sure that aliens have
7 landed, yet you are willing to believe
8 that because your master has said it,
9 correct?

10 A. We believe in him. What is
11 wrong that we believe in him?

12 Q. Why not believe somebody else?
13 What is it about him? Why not believe what
14 anybody else says?

15 A. Because I believe in this
16 religion, so that's why I believe in him.

17 Q. But you can't prove it? You
18 can't prove he is right and Jesus was
19 wrong, right?

20 A. In my belief in this religion I
21 just believe. What is wrong with that?

22 Q. And what is wrong with Michael
23 Chu saying and I just believe you are a
24 cult? Why can't you both just believe what
25 you believe?

Page 147

1 ZHOU

2 Q. True, correct?

3 A. Yes.

4 Q. You are the only witness, the
5 only other witness to this statement that
6 you suddenly remember was killed in a car
7 accident, correct?

8 MS. MARSH: Objection.

9 A. I also wanted to add some more.
10 Li Huahong did not have a job. Her only
11 job is to set up that table to face us
12 every day. So where is the money coming
13 from, money that she gave to people, the
14 participants.

15 Q. Do you go to -- do you go to
16 your tables every day?

17 A. Yes.

18 Q. Do you have a job other than
19 going to the tables every day?

20 A. Yes.

21 Q. What is your job?

22 A. Oh. So when I have my off time,
23 I would go to the piano store to help to
24 modify the pianos. Also I give tutoring
25 to students for musical instrument when I

1 ZHOU

2 have my spare time.

3 Q. Did you know that Li Huahong has
4 also worked during the times that she has
5 been staffing the tables or you made an
6 assumption that she's never worked?

7 A. Well, you could see that she was
8 there every day. How could her have a
9 job.

10 Q. But you're at tables every day?

11 A. Yes, I went there every day;
12 however, I used my spare time to make
13 extra money.

14 Q. How do you know what she does in
15 her spare time?

16 A. Yes, she also -- she may also
17 have off time, but what type of skill she
18 have.

19 Q. How do you know -- how would you
20 know what skills she has? You don't have
21 any knowledge of what skills she has.
22 You're just making assumptions, aren't
23 you? Aren't you just making assumptions
24 about her?

25 A. To my knowledge, she did not

1 ZHOU

2 with him calling you a strange, bizarre
3 religion? Are you okay with that?

4 A. That I don't care, but whenever
5 he said that we are an evil religion and
6 also they try to douzheng with us or PK
7 with us, this is absolutely unacceptable.

8 Q. Did you go to Barclay's Center
9 and see Li Hongzhi this year speak at
10 Barclay's Center in Brooklyn?

11 A. Yes, I did.

12 Q. Did he say that cell phones are
13 made with alien technology, technology
14 that we got from other planets, that
15 extraterrestrials brought to the earth?

16 A. What's the meaning of explaining
17 about this topic?

18 Q. I am asking you when you went to
19 Barclay Center did he say that cell phones
20 are made from alien technology?

21 A. I just want to know that, you
22 know, what is the purpose for you to
23 investigate this topic.

24 Q. I am just -- I am defending my
25 client who called you a cult, and I want

1 ZHOU

2 A. Yes, personally I think so.

3 Q. Okay. So in the United States,
4 are you familiar with that when you go to
5 school if you are a child and you are a
6 young child and you go to school that we
7 don't teach religion in school to young
8 children? Are you familiar with that idea?

9 A. I don't know about these.

10 Q. Well, the idea is that a young
11 mind is a very impressionable, and
12 religion is controversial. There are a
13 lot of different religions. So we have
14 separation of church and state. If you
15 go to school you learn subjects, and then
16 your parents could send you to whatever
17 church they want on your own time, on
18 family time.

19 So what made you think as an
20 adult teacher with power over children,
21 what made you think that it was
22 appropriate for you to hand out religious
23 material during the school day to
24 children, to young children?

25 A. Because China is different from

EXHIBIT 8

EXCERPTS OF DEPOSITION OF YANG HU

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

EHANG Jingrong, SHOU Yanhua, EHANG)	
Peng, EHANG Cuiping, WEI Min, LO)	
Kitsuen, CAO Lijun, HU Yang, GUO)	
Xiaofang, GAO Jinying, CUI Lina,)	
XU Ting, BIAN Hexiang,)	INDEX NO.
)	15 CV 1046
Plaintiffs,)	(SLT) (VMS)
)	
- against -)	
)	
Chinese Anti-Cult World Alliance)	
(CACWA), Michael CHU, LI Huahong,)	
WAN Hongjuan, SHU Sirou, and DOES)	
1-5 Inclusive,)	
)	
Defendants.)	
_____)	

1250 Broadway
New York, New York

June 24, 2016
9:47 a.m.

Videotaped deposition of the Plaintiff
YANG HU, held at the offices of VERITEXT LEGAL
SOLUTIONS, pursuant to Notice, before LINDA
DEVECKA, a Notary Public of the State of New
York.

1

2 APPEARANCES:

3

4 HUMAN RIGHTS LAW FOUNDATION

5 Attorneys for Plaintiffs

6 1615 L Street, NW, Suite 1100

7 Washington, D.C. 20036

8 BY: TERRI MARSH, ESQ.

9

10

11 CATAFAGO FINI LLP

12 Attorneys for Defendants Chinese Anti-Cult World

13 Alliance, Michael Chu, Li Huahong and Zhu Zirou

14 The Empire State Building

15 350 Fifth Avenue, Suite 7412

16 New York, New York 10118

17 BY: TOM M. FINI, ESQ.

18

19

20 ALSO PRESENT:

21 ARTHUR KWOK, MANDARIN INTERPRETER

22 ROBERT BENIMOFF, VIDEOGRAPHER

23 DANA CHENG, MANDARIN INTERPRETER

24

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- o0o -

1 Hu

2 A. No.

3 Q. In other words, what I am asking you is
4 did you have any doubt or skepticism at first?

5 A. No, not really. I did not practice Falun
6 Gong out of any particular reason. So there's no
7 such thing as a need to prove anything or get
8 anything.

9 Q. Describe what happened then. You started
10 to do the exercises and what happened?

11 A. So what happened after I started
12 practicing these movements?

13 Q. So you went to the park, you did the
14 exercises?

15 A. Yes.

16 Q. You were finished.

17 A. After that my mom went back to normal
18 work.

19 Q. Then when is the next encounter with Falun
20 Gong you had?

21 A. What do you mean by again? I was always
22 in contact. Every day I go to the park and practice.

23 Q. That's what I mean. By the way, you are
24 answering the questions. Part of it is the
25 translation.

1 Hu

2 A. Well, I don't remember hearing that, but
3 what I do remember was he talked about we, each
4 individual, should do our utmost what we are supposed
5 to do.

6 Q. How many hours a day do you either read
7 Falun Gong material or meditate or do the exercises,
8 any type of Falun Gong activity; how many hours a
9 day?

10 A. Well, each day I would at least use one
11 hour of time to read the books, his writings. And in
12 terms of the special movements, it depends if I have
13 a lot of free time, I will spend more time that day,
14 if I have more free time to practice the special
15 movements. And less practicing of the special
16 movement if I have less time.

17 Q. Does your meditating and practicing Falun
18 Gong make you feel peaceful?

19 A. Yes.

20 Q. When you go to sleep, do you sleep well at
21 night?

22 A. Very much so.

23 Q. Do you see any medical doctors?

24 A. No. Why would I go see a doctor?

25 Q. Do you see any psychiatrist about mental

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1 Hu

2 Q. Does Master Li talk about karma?

3 A. He did talk about or mention karma. As a
4 matter of fact, most eastern beliefs such as
5 Buddhism, Taoism, Tibetan Buddhism like the Dalai
6 Lama all talked about it.

7 Q. I didn't say they didn't.

8 A. Yes. I am just expressing what I am
9 trying to say.

10 Q. But I asked you whether Master Li talks
11 about karma. I didn't ask you about whether other
12 people talked about karma. I asked you whether he
13 talks about karma.

14 A. Yes.

15 Q. Okay. Thank you.

16 Does he think you should get rid of karma?

17 A. Yes.

18 Q. How do you get rid of karma according to
19 Master Li?

20 A. How to get rid of karma?

21 Q. Yes.

22 A. Through the teachings of Teacher or Master
23 Li, and if we practice truthfulness, compassion,
24 forbearance to become a good person, to become a
25 better person and to purify our spirit, and slowly,

Page 27

1 Hu

2 bit-by-bit, you can get rid of your karma.

3 Q. Can you do that just by thinking those
4 things and acting nice to people or do you also have
5 to do the five movements?

6 A. I don't understand the question.

7 Q. I know a lot of people who are
8 compassionate to their children and their neighbors,
9 they act nice. As I understand it, Master Li would
10 say that's nice, but if you are Falun Gong and you
11 really want to get rid of the karma, you also have to
12 do the five movements. It's not enough just to be
13 compassionate. A lot of people are compassionate who
14 are not Falun Gong.

15 So what I am asking is, to get rid of the
16 karma, does Master Li teach that one of the things
17 you must do, among others, are the five movements?

18 A. Well, I don't remember which book my
19 teacher/master had written those words, and the words
20 you use I just want to point out was not original
21 quote from my teacher/master.

22 Q. I am not quoting anything. I am asking
23 you.

24 A. Well, in that case I will just say that my
25 teacher, my master taught me to start from our

1 Hu

2 but marriage is one? It's like that?

3 A. No.

4 Q. What do you want to call it? I want to
5 call it whatever you want to call it. I want to make
6 you happy.

7 A. Xiu liang.

8 Q. Xiu liang, did you say that that was
9 supplemental to the compassion? It comes as a
10 supplement?

11 A. First of all, we meditate on truthfulness,
12 compassion and forbearance. And I already did say
13 that we meditate on truthfulness, compassion and
14 forbearance. I did not say it's a supplement.

15 Q. I am talking about the five movements.

16 A. For the five movements, then it's two
17 words, xiu liang.

18 Q. I asked you whether xiu liang was
19 something that the master taught one needed to do to
20 get rid of the karma?

21 A. Yes. So your question is whether that's
22 true. So, yes.

23 Q. The master taught that?

24 A. No. I am talking about the practitioners
25 of the xiu liang. So, to get rid of karma, you have

1 Hu

2 correct?

3 MS. MARSH: Objection.

4 A. That's really confusing. All I said was I
5 follow exactly what my master taught in terms of the
6 movements, and I don't know anything else besides
7 that.

8 Q. But do you agree with him that only those
9 five are going to really get rid of the karma, that
10 it has to be those five movements?

11 MS. MARSH: Objection.

12 A. Oh, my, what does that mean? When you say
13 "movements" it's a little confusing. Are you talking
14 about my Falun Gong movement or something else? If
15 you can be more specific.

16 Q. The five movements that you talked about.

17 A. Okay. So what about the five movements?

18 Q. Do you agree with Li Hongzhi that the only
19 way to really get rid of karma in human beings is to
20 do those exact five movements?

21 MS. MARSH: Objection.

22 A. My master never said to practice those
23 movements in order to get rid of karma.

24 Q. What did he say?

25 A. Well, in Falun Gong we only have five sets

1 Hu

2 my labor I can fill my stomach with rice and put
3 clothing on my back. However, I don't know how to
4 let other people fill their stomach full, put clothes
5 on their back.

6 Q. So you acknowledge that it's possible that
7 what Master Li teaches is not the fundamental truth?

8 MS. MARSH: Objection.

9 A. What? If I don't completely believe in
10 what my teacher/master taught me, how could I be a
11 true practitioner?

12 Q. Right. So then if you truly believe what
13 he taught you, do you think that people can get rid
14 of karma through other practices that he doesn't
15 teach?

16 MS. MARSH: Objection.

17 A. Well, I believe that I could get rid of my
18 karma by xiu liang. But of course I understand that
19 other people have other means of getting rid of their
20 karma.

21 Q. Do you believe that they will be
22 successful in fully getting rid of their karma
23 without using Falun Gong?

24 MS. MARSH: Objection.

25 A. I don't know.

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1 Hu

2 China?

3 A. For example, I can publicly gather with
4 fellow Falun Gong practitioners and practice in
5 public the movements. And I am free to hand out
6 pamphlets and publicize Falun Gong to anyone.

7 Q. How often do you now on average during the
8 week, how often do you hand out pamphlets now,
9 nowadays?

10 A. Right now or back then?

11 Q. In the past month.

12 A. When I moved to Middletown last December,
13 because of the Caucasians who speak English there and
14 the fact that I don't speak English well, I was
15 unable to continue my work of sending out fliers.
16 However, instead of that, I spend time on the
17 computer, Internet, and send the content of the
18 pamphlets back to China.

19 Q. When did you move to Middletown?

20 A. December 1014.

21 Q. Do you still feel the same general freedom
22 to practice Falun Gong in Middletown however you
23 choose?

24 A. Yes.

25 Q. What are the last three Falun Gong events

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1 Hu

2 or activities you went to outside of your house?

3 A. There was a gathering April 25th, 2016, in
4 Flushing. A public gathering. And then every week
5 in Middletown we have one day where we get together
6 and study the master/teacher's writings.

7 Q. On April 25th you said you went to
8 Flushing? Did you go to Flushing?

9 A. Yes.

10 Q. How did you get there?

11 A. Drove.

12 Q. And where did you park?

13 A. I pulled over near this park in Flushing
14 and then I asked my dad to drive it to the parking
15 lot. I got out at the meeting point or starting
16 point in Flushing.

17 Q. Then how did you travel to the event?

18 A. I dropped myself off and asked my dad to
19 drive it to the parking lot. At the point where
20 everybody was supposed to meet, at the beginning
21 point of the meeting.

22 Q. Did you walk around Flushing?

23 A. Yes. We had a gathering, public
24 gathering.

25 Q. When is the next Falun Gong event you are

1 Hu

2 planning on attending?

3 A. You mean the next one?

4 Q. Yes.

5 A. I also always attend the weekly study
6 group meeting.

7 Q. Am I correct that unlike China, you walk
8 around and travel around wherever you want and
9 practice Falun Gong?

10 A. Yes.

11 Q. When is the last time you were in
12 Flushing?

13 A. Sometime this month. I don't remember
14 exactly when, but this month.

15 Q. Were you meeting with Falun Gong friends?

16 A. No.

17 Q. When is the last time you met in Flushing
18 with Falun Gong friends?

19 A. April 25th.

20 Q. I may have asked this, but did you walk
21 around Main Street?

22 A. When?

23 Q. In April.

24 A. What do you mean by "walk around"?

25 Q. Was the gathering that you went to, was it

1 Hu

2 beating, my nose was bleeding non-stop. No one asked
3 me about it at all. So that's merely my physical
4 suffering at the time. But my mental suffering went
5 way beyond that. And I did not mention my mom. I
6 just want to say before all that, they also
7 illegally, forcefully detained and took my mom away.

8 At the time they took me into the police
9 station, I was locked up on the second floor. They
10 locked my mom up on the third floor. During the
11 interrogation of me they couldn't get any valuable
12 answers that they were looking for. They then took
13 me to the same room that they locked my mom in, and
14 they tortured my mom. And I had to observe on the
15 side.

16 Q. What did they do to her?

17 A. They hit her with a stick with the rubber
18 or plastic outside about that (indicating) size, that
19 dimension. And they hit her without visible wounds
20 but with bruises. And they banged on her face around
21 her teeth. Kept banging, kept banging like that
22 (indicating). And my mom's hands were locked in the
23 back like this (indicating). And then one of the
24 policeman flipped her hand over like that
25 (indicating.) Just talking about it may not seem

1 Hu

2 extraordinary but, Attorney, maybe you can try if you
3 want that position. And also my mom was sitting on
4 an iron chair, and they used electric rods to hit the
5 chair. And they allowed me to watch right next to
6 her. There was no way for me to avoid it. I had to
7 watch under the circumstances.

8 Q. I understand.

9 Do you know that Michael Chu is a
10 defendant in this case?

11 A. Are you talking about Zhu Lichuang?

12 Q. Yes. Do you know that he is also called
13 Michael Chu?

14 A. I heard about it. However, normally I
15 call him Zhu Lichuang.

16 Q. For the purposes of this deposition since
17 your Complaint calls him Michael Chu, is it okay if I
18 call him Michael Chu?

19 A. Yes.

20 Q. Have you ever seen Michael Chu?

21 A. Yes. Quite a few times. Many times.

22 Q. Did you know that Michael Chu gave a
23 deposition in this case?

24 A. He provided testimony to whom?

25 Q. Exactly like you are doing, he answered

1 Hu

2 public in those environments.

3 Q. So did you practice Falun Gong in private?

4 A. Correct. So each one of us practiced at
5 home individually and learned the way.

6 Q. In 1999 how old were you?

7 A. 20.

8 Q. In 1999 when you were 20 years old, had
9 you visited the United States?

10 A. No.

11 Q. Had you ever been arrested other than for
12 that incident where you appeared in public with the
13 thousands of people?

14 A. Yes. Sometime in the summer of '08. I
15 don't remember exactly.

16 Q. In 2008 you were arrested in China again?

17 A. Yes. No, I was illegally taken away that
18 day.

19 Q. Who were you taken away by?

20 A. A so-called national security group from
21 Dalian. Some kind of group.

22 Q. Where did they find you?

23 A. At home.

24 Q. They knocked on the door?

25 A. Banged on the door.

1 Hu

2 Q. Someone opened the door?

3 A. Yes.

4 Q. And what happened?

5 A. Well, there were ten-plus policemen. At
6 the time I didn't see any so-called search warrants
7 or anything like that. And after they came in, they
8 were looking all over the place, including all the
9 drawers, under the bed, in the chest. My daughter
10 was one-year-old at that time. And my daughter was
11 crying, was scared by the situation where they were
12 banging on the door, knocking down the doors.

13 At the time the police found some
14 literature related to Dafa. A notebook computer. A
15 small DVD, mini DVD players, and some material that
16 relates to the truth of why Falun Gong was being
17 persecuted, and also some unused A4 white paper.

18 Q. What was the truth about why Falun Gong
19 was being persecuted?

20 A. In China we are forbidden to practice
21 Falun Gong.

22 Q. Right, but you said there was literature
23 that they found that talked about the truth about why
24 you were being persecuted.

25 A. Yes.

1 Hu

2 clearly feel that there's a -- that while I am
3 practicing the movement, I feel that wheel in my
4 stomach in reality actually is moving.

5 Q. Would it be insulting to you if someone
6 like me said that that just sounds not scientific and
7 silly?

8 A. I want to ask you a question. If you can
9 not see air, yet you believe it, would that be funny?

10 Q. But the reason I believe the things I
11 believe is because of empirical science, where
12 scientists prove it by showing it. They prove it by
13 showing it with observation. This wheel, Li Hongzhi
14 just says it. What is his proof of this?

15 A. To prove what? Why would I care what
16 other people would or would not prove if in fact I
17 personally felt a little wheel in me turning.

18 Q. Because if there's a little wheel in you
19 turning, why are all the scientists -- the brilliant
20 scientists, why can't we find the wheel?

21 A. Can the scientists see the other
22 dimension, the other space?

23 Q. I understand, but someone like me just
24 admits I don't know what is in the other dimension.
25 I don't see it. Someone like you, because Li Hongzhi

1 Hu

2 wrote it, you believe it.

3 Do you understand the struggle there is,
4 the philosophical struggle?

5 A. Well, I think I already sufficiently
6 expressed my view, and that is I personally felt a
7 little wheel turning in my stomach. Besides, science
8 continues to progress. Can you definitively say that
9 even though science has not developed up to this
10 stage, then this is not science? And if science had
11 reached the point where they could see the other
12 dimension, the other space, I believe they would be
13 able to see that wheel.

14 Q. Is it possible that Li Hongzhi says all
15 these things and maybe he is wrong?

16 A. At least I have not discovered that yet.

17 MR. FINI: I want to tell you that I
18 enjoyed speaking with you today. I thank you
19 for your patience.

20 THE WITNESS: Thank you.

21 MR. FINI: My partner and I would not
22 represent the defendants if we believed they
23 actually wanted to have any violence on a person
24 like you, and I respect your views, and I want
25 to wish you a good evening.

1 Hu

2 Falun Gong, she is very supportive of my choosing to
3 practice Falun Gong.

4 Q. And you two travel wherever you want when
5 you attend Falun Gong events?

6 MS. MARSH: Objection.

7 A. Well, yes, in the sense that when I
8 attended that parade, my wife accompanied me.

9 Q. Did you go to the Barclay Center?

10 A. Yes.

11 Q. How many people were at the Barclay
12 Center?

13 A. A lot.

14 Q. Thousands?

15 A. More.

16 Q. More than 10,000?

17 A. Should be several thousand.

18 Q. Was Li Hongzhi at the Barclay Center?

19 A. Yes. My master/teacher showed up.

20 Q. Did he seem happy?

21 A. Well, you are talking about my sifu. He
22 was too far for me to really get a read on his facial
23 expression.

24 Q. I saw a photo of the event. He was
25 smiling.

1 Hu

2 Q. What did you study?

3 A. Finance and accounting.

4 Q. Through that vocational school, what was
5 the year you graduated from that vocational school?

6 A. The specialized vocational school I
7 finished in '96 or graduated in '96.

8 Q. Through 1996, did you pass all of the
9 classes in all of the schools that you attended?

10 A. Yes.

11 Q. Were you ever disciplined in school for
12 misbehavior?

13 A. No.

14 Q. When you were growing up, through the
15 vocational school to 1996, did your parents practice
16 a religion?

17 A. My mother, yes.

18 Q. What was the religion your mother
19 practiced?

20 A. Falun Gong.

21 Q. When did she start to practice Falun Gong?

22 A. 1994.

23 Q. When you were in vocational school, you
24 graduated in 1996. What were the years of that
25 vocational school?

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1 Hu

2 Q. Does Master Li talk about karma?

3 A. He did talk about or mention karma. As a
4 matter of fact, most eastern beliefs such as
5 Buddhism, Taoism, Tibetan Buddhism like the Dalai
6 Lama all talked about it.

7 Q. I didn't say they didn't.

8 A. Yes. I am just expressing what I am
9 trying to say.

10 Q. But I asked you whether Master Li talks
11 about karma. I didn't ask you about whether other
12 people talked about karma. I asked you whether he
13 talks about karma.

14 A. Yes.

15 Q. Okay. Thank you.

16 Does he think you should get rid of karma?

17 A. Yes.

18 Q. How do you get rid of karma according to
19 Master Li?

20 A. How to get rid of karma?

21 Q. Yes.

22 A. Through the teachings of Teacher or Master
23 Li, and if we practice truthfulness, compassion,
24 forbearance to become a good person, to become a
25 better person and to purify our spirit, and slowly,

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1 Hu

2 bit-by-bit, you can get rid of your karma.

3 Q. Can you do that just by thinking those
4 things and acting nice to people or do you also have
5 to do the five movements?

6 A. I don't understand the question.

7 Q. I know a lot of people who are
8 compassionate to their children and their neighbors,
9 they act nice. As I understand it, Master Li would
10 say that's nice, but if you are Falun Gong and you
11 really want to get rid of the karma, you also have to
12 do the five movements. It's not enough just to be
13 compassionate. A lot of people are compassionate who
14 are not Falun Gong.

15 So what I am asking is, to get rid of the
16 karma, does Master Li teach that one of the things
17 you must do, among others, are the five movements?

18 A. Well, I don't remember which book my
19 teacher/master had written those words, and the words
20 you use I just want to point out was not original
21 quote from my teacher/master.

22 Q. I am not quoting anything. I am asking
23 you.

24 A. Well, in that case I will just say that my
25 teacher, my master taught me to start from our

EXHIBIT 9

EXCERPTS OF DEPOSITION OF KITSUEN LO

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF NEW YORK

INDEX NO. 15 CV 1046

-----x

ZHANG Jingrong, ZHOU Yanhua, ZHANG Peng,
ZHANG Cuiping, WEI Min, LO Kitsuen, LI
Xiurong, CAO Lijun, HU Yang, GAO Jinying,
CUI Lina, XU Ting, and BIAN Hexiang,
Plaintiffs,

- against -

Chinese Anti-Cult World Alliance (CACWA),
Michael CHU, LI Huahong,
WAN Hongjuan, ZHU Sirou, and DOES
1-5 Inclusive,
Defendants.

-----x

September 16, 2016

9:50 a.m.

VIDEOTAPE DEPOSITION of LO

KITSUEN, taken by the Defendants, pursuant
to notice, held at the offices of Beldock
Levine Hoffman & Goodman, LLP before
Debbie Saromatidis, a Notary Public of the
State of New York.

1

2 A P P E A R A N C E S:

3

4 HUMAN RIGHTS LAW FOUNDATION

5 Attorneys for Plaintiffs

6 1615 L Street, NW, Suite 1100

7 Washington, D.C. 20036

8 BY: TERRI MARSH, ESQ.

9

- and -

10 BELDOCK LEVINE & HOFFMAN, LLP

11 99 Park Avenue

12 New York, New York 10016

13 BY: KEITH SZCZEPANSKI, ESQ.

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1
2 A P P E A R A N C E S: (CONTINUED)

3
4 CATAFAGO FINI LLP
5 Attorneys for Defendants Chinese
6 Anti-Cult World Alliance, Michael Chu,
7 and Zhu Zirou

8 The Empire State Building
9 350 Fifth Avenue, Suite 7412
10 New York, New York 10118

11 BY: THOMAS M. FINI, ESQ.

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25

<p style="text-align: right;">Page 38</p> <p>1 LO</p> <p>2 A. So after reading their papers</p> <p>3 for a while, I liked it, and then I</p> <p>4 started to go to nearby location where</p> <p>5 they did exercises, and I wanted to join,</p> <p>6 to participate. Then after I was</p> <p>7 introduced Falun Gong told me how to</p> <p>8 practice -- how to do it, how to do Falun</p> <p>9 Gong.</p> <p>10 Q. Where was this nearby location?</p> <p>11 A. Across the street from the</p> <p>12 Queens Botanical Garden at a</p> <p>13 corner -- across the street from the</p> <p>14 Botanical Garden is Kissena Park at a</p> <p>15 corner over there.</p> <p>16 Any problem?</p> <p>17 Q. No.</p> <p>18 A. And then I went there on a daily</p> <p>19 basis to practice.</p> <p>20 Q. Approximately what year did you</p> <p>21 first go to this park?</p> <p>22 A. That was in '04, '05; however</p> <p>23 actually it was a lot earlier. It was in</p> <p>24 '01, '02 when I first went -- when I</p> <p>25 inquired about it. They taught me a move,</p>	<p style="text-align: right;">Page 40</p> <p>1 LO</p> <p>2 A. Flushing, yes.</p> <p>3 Q. How do you get there?</p> <p>4 A. I walked over.</p> <p>5 Q. How long does it take you to</p> <p>6 walk over there?</p> <p>7 A. Less than ten minutes, maybe</p> <p>8 five, six minutes.</p> <p>9 Q. You said there came a point</p> <p>10 where there was one park you used to go to</p> <p>11 daily, and is it correct that at some</p> <p>12 point you changed to another park that you</p> <p>13 would then would go to daily; is that</p> <p>14 correct?</p> <p>15 MR. SZCZEPANSKI: Objection.</p> <p>16 A. Yes, correct.</p> <p>17 Q. What year did you start going to</p> <p>18 the second park daily?</p> <p>19 A. This year.</p> <p>20 Q. What month of this year did you</p> <p>21 start going to this other park?</p> <p>22 A. Maybe June, July possibly. I</p> <p>23 can't really remember.</p> <p>24 Q. So I just want to make sure the</p> <p>25 testimony is clear.</p>
<p style="text-align: right;">Page 39</p> <p>1 LO</p> <p>2 but it was too difficult, and then I</p> <p>3 slowly, slowly practiced that move at home</p> <p>4 and slowly, slowly I was able to do it.</p> <p>5 After I learned it, I started</p> <p>6 participating every morning in their</p> <p>7 exercises.</p> <p>8 Q. And when did you start going</p> <p>9 daily to this park?</p> <p>10 A. Around '04, '05 approximately.</p> <p>11 Q. Do you still go to this park?</p> <p>12 A. I still go every morning, but</p> <p>13 not to this spot, to a different location.</p> <p>14 Q. What is the other location you</p> <p>15 go to?</p> <p>16 A. I can't really exactly tell you,</p> <p>17 but it's a location exercise -- a</p> <p>18 playground or exercise playground at the</p> <p>19 intersection or near the intersection of</p> <p>20 Union and Sanford.</p> <p>21 Q. Is it Union Turnpike? When you</p> <p>22 say Union, Union Turnpike?</p> <p>23 A. Union Street.</p> <p>24 Q. Union Street. Is it in</p> <p>25 Flushing?</p>	<p style="text-align: right;">Page 41</p> <p>1 LO</p> <p>2 MR. FINI: Would you translate</p> <p>3 that.</p> <p>4 Q. Am I correct that you're -- you</p> <p>5 are testifying that in 2004 or '5, one of</p> <p>6 those years you started to go to the</p> <p>7 Kissena park daily, and you went there</p> <p>8 daily to practice Falun Gong up until</p> <p>9 June -- approximately June of this year;</p> <p>10 is that correct?</p> <p>11 MR. SZCZEPANSKI: Objection.</p> <p>12 MS. MARSH: Objection.</p> <p>13 A. However, during the transition</p> <p>14 there was a period of time during the</p> <p>15 switch that I did not participate. I did</p> <p>16 not go.</p> <p>17 Q. Okay. And what was the reason</p> <p>18 for the switch?</p> <p>19 A. Closer. This is closer.</p> <p>20 Q. Okay. And how did you find out</p> <p>21 about the closer location?</p> <p>22 A. Because I passed by because it</p> <p>23 is close, and I was told also by the</p> <p>24 people.</p> <p>25 Q. And when you found out about the</p>

Page 42

1 LO
2 second location, why didn't you
3 immediately start going to the second
4 location? Why did you say there was a
5 little bit of a gap?
6 A. Well, because -- well, because
7 there are several sets of Gong Fa or
8 exercise, and I believe I feel that
9 several of the exercise were excellent,
10 really good. So I extended the timing or
11 extended, elongated the time, and that
12 caused me to be out of synch in terms of
13 practice, in terms of the movements with
14 the rest of the people that were
15 practicing it, exercising. So I went and
16 practiced it myself by myself.
17 Q. Approximately how long did you
18 practice it yourself before you felt you
19 were ready to attend the second park?
20 A. I don't remember exactly, but I
21 would say approximately I did that for a
22 few years.
23 Q. There is probably -- there may
24 be a miscommunication.
25 MR. FINI: Just translate that.

Page 43

1 LO
2 THE INTERPRETER: Okay.
3 Q. I just want to make sure we have
4 the timeline correct.
5 So you started to go daily to
6 the park, the Kissena park in about 2004,
7 2005, correct?
8 A. Yes. Yes.
9 Q. And you went to that park to
10 practice Falun Gong daily from 2004, 2005
11 all the way until approximately June 2016,
12 correct?
13 A. No. No.
14 Q. Okay. So then you started to
15 go daily to the Kissena park in 2004,
16 2005, correct?
17 A. Yes. I started there, yes.
18 Q. And until -- I want to know how
19 many years you went there daily, so I want
20 to know when you stopped going there what
21 year did you stop going to Kissena park
22 daily? I know when it started, and now I
23 want to know when it stopped.
24 A. I don't remember. That I don't
25 remember.

Page 44

1 LO
2 Q. Okay. So I need an -- I want
3 you to do your best just to think about it
4 approximately. We are in 2016. So, for
5 example, were you going to Kissena park do
6 you think in 2015?
7 THE INTERPRETER: Can I have
8 question again.
9 (Record read.)
10 MR. FINI: Wait. He started to
11 go to Kissena park from 2004 to 2005, and
12 he went there for a period of time. I
13 want to make sure you understand this
14 concept. I am trying to find out how
15 long he went to the first park, A, which
16 is Kissena park. I am going to ask
17 another question. You got it?
18 THE INTERPRETER: I got it
19 but --
20 MR. FINI: Okay. So here it
21 is.
22 Q. You started to go to Kissena
23 park daily in 2004, 2005, correct?
24 A. Yes.
25 Q. Okay. For approximately how

Page 45

1 LO
2 many years did you go daily to Kissena
3 park to practice Falun Gong?
4 A. I don't remember exactly.
5 Maybe a few years.
6 Q. Okay. And I don't need you to
7 remember exactly. I'm trying to get the
8 best of your recollection.
9 To the best of your
10 recollection, approximately how many years
11 did you go daily to practice Falun Gong in
12 the Kissena park?
13 MR. SZCZEPANSKI: Objection.
14 A. Well, I practiced Falun Gong all
15 the way from '04, '05 until now.
16 Q. Right. And you described that
17 there was a point in time where you went
18 to Kissena park, and then you said there
19 was a point in time where you went to a
20 second park, correct?
21 A. Yes.
22 Q. Okay. And what I'm -- what I
23 need to clarify for the record is
24 approximately when you stopped going to
25 Kissena park and then started to go to the

1 LO

2 a point in time where you decided to go to
3 the second park. You don't remember the
4 year though, correct?

5 A. No, I said this year. I already
6 said this year. I started this year.

7 Q. Okay. So before this year in
8 2015, for example, last year, where would
9 you go to practice Falun Gong last year in
10 2015?

11 A. Home.

12 Q. Okay. So in 2015 did you
13 practice Falun Gong publically anywhere?

14 A. No, if you're talking about in
15 public. I did, however, go on gatherings,
16 parades.

17 Q. Okay. So is it -- is it your
18 testimony that at some point you stopped
19 going regularly to Kissena park because
20 you wanted to go to the second park, but
21 you needed to study the movements on your
22 own before you felt comfortable joining
23 the second park?

24 MS. MARSH: Objection.

25 A. No. As I mentioned before

1 LO

2 A. Yes. I participate in group
3 study of the scriptures, in gatherings and
4 parades, and the most important thing to
5 do that I do is to go to the spiritual
6 station or center.

7 THE INTERPRETER: I am going to
8 ask him to repeat the last part of the
9 answer because I didn't catch it.

10 A. To participate on a daily basis
11 at the spiritual station or gathering
12 point in Flushing.

13 Q. Where is the spiritual --

14 MR. FINI: Strike that.

15 Q. Are you calling that the
16 spiritual center?

17 A. At the spiritual center they
18 provide the materials and advertising our
19 points of view, tables. They provide
20 tables. Things like that.

21 Q. Where is that spiritual center
22 located?

23 A. 46-40 Main Street, Room 201.

24 Q. And so it's in a building,
25 correct?

1 LO

2 talk about nature of Falun Gong, what does
3 it mean to practice Falun Gong and the
4 basic requirements, the very basic, the
5 basic requirements of Falun Gong in terms
6 of being special characteristics of
7 truthfulness, compassion, truth,
8 tolerance, and also the five Gong Fa or
9 five movements, five exercise.

10 Q. Does Falun Gong believe that we
11 may be in a -- the end of days like a
12 final stage of mankind?

13 MR. SZCZEPANSKI: Objection.

14 A. Well, in terms of the end of
15 time, Christianity have some similar
16 tales. At the end of the time most
17 people will be killed.

18 Q. Yes, but I am not asking about
19 Christianity. I'm asking about you. I
20 am asking about Falun Gong and you.

21 Does Falun Gong believe that we
22 are in some end of days period right now?

23 MR. SZCZEPANSKI: Objection.

24 A. Well, in terms of these high
25 level beliefs and religions, they all have

1 LO

2 does this go?

3 A. For several years, but exactly
4 how many I cannot -- I don't remember.

5 Q. But would it be safe to say --
6 We are in 2016.

7 Is it safe to say that at least
8 for the past two years basically every day
9 you've been at one of the tables in
10 Flushing; is that correct?

11 MR. SZCZEPANSKI: Objection.

12 A. Well, there were times in the
13 past that I -- there were certain periods
14 of time in the past that I didn't go every
15 day.

16 Q. I -- I understand that. I mean
17 people get sick or they have to travel.
18 I understand we don't mean literally every
19 single day, but for the purpose of the
20 question what I am asking is generally is
21 it correct that you went to the table
22 daily, not every single day of the year
23 but generally daily for at least the past
24 two years?

25 A. Yes.

1 LO

2 Q. Do you know that Li Hongzhi
3 visited New York this year?

4 A. To New York. I don't really
5 know.

6 Q. Okay. He was at the Barclay's
7 Center in Brooklyn. Did you hear about
8 this?

9 MR. SZCZEPANSKI: Objection.

10 A. Oh, yes. Yes.

11 Q. Did you go?

12 A. I did. I did go.

13 Q. How long did he speak?

14 A. About two, three hours. I
15 don't know exactly.

16 Q. And how many people were at
17 Barclay's Center to see him?

18 MR. SZCZEPANSKI: Objection.

19 A. Maybe about 6,000, 7,000. I
20 don't remember exactly.

21 Q. Was the stage -- was Barclay's
22 Center filled with Falun Gong
23 practitioners?

24 A. Yes, Full.

25 Q. And how did you get to Barclay's

1 LO

2 A. Yes.

3 Q. Did you say that you go to that
4 location daily?

5 A. No. No. I don't go here
6 every day. I meant to say I go to the
7 gathering point or tables that are located
8 in Flushing.

9 Q. How often do you go to the
10 spiritual center room 201? How often do
11 you go there?

12 MR. SZCZEPANSKI: Objection.

13 A. Not every day. I only go when
14 there is reason to go; otherwise, I don't.

15 Q. Approximately. When is there
16 reason to go? When is there reason to go?

17 A. Nothing in particular, but, for
18 example, if I am running out of fliers,
19 materials, I will go there and pick up
20 some more.

21 Q. Okay. And do you go -- did you
22 say you go to tables in Flushing every
23 day?

24 MR. SZCZEPANSKI: Objection.

25 A. Correct.

1 LO

2 Q. Are there five tables in
3 Flushing?

4 A. Approximately five, six.

5 Q. Do you typically go to specific
6 tables or do you rotate and go to all five
7 depending on the day?

8 A. I would stay at one table on any
9 particular day.

10 Q. Right. And do you typically go
11 only to one table or over the course of a
12 week will you rotate and go to others of
13 the five tables?

14 A. It varies. It varies.

15 Q. Okay. And have -- do you
16 typically -- during the week how many days
17 of a typical week, how many days are you
18 at least at one of the tables in Flushing?

19 MR. SZCZEPANSKI: Objection.

20 Q. Out of the seven days, how many
21 days are you manning one of the tables?

22 A. Every day.

23 Q. And for how many years have you
24 been going to at least one table in
25 Flushing every day? How many years back

1 LO

2 MR. SZCZEPANSKI: Objection.

3 A. Well, I don't really know too
4 much specifics, but he organized people to
5 attack the table in front of the golden
6 mall.

7 Q. Did you see him? Did you see
8 him -- did you see --

9 A. (In English) Not him. I heard.

10 Q. You heard from who?

11 A. I cannot remember specifically.
12 I mean it was from conversation that
13 we -- we normally have.

14 Q. And is Falun Gong a religion?

15 A. It is a religion. It is a
16 religion. In China it's not a religion.

17 It's a cult. It is a heresy, but
18 in -- but in the western world it's

19 religion. We worship our God. We have
20 our scripture, and when we gather together
21 we have to learn the scripture. We have
22 to read and memorize the scripture, and
23 when we gather we also do our five
24 movements, five exercises.

25 Q. Why did Li Hongzhi say that it

1 LO

2 morning -- in the morning when we practice
3 the movement.

4 Q. Okay. And how do you practice
5 your religion at the spiritual center?

6 MR. FINI: Objection.

7 A. Well, we all gather at the
8 spiritual center, read the scripture,
9 memorize the scripture, and exchange
10 discuss -- and have discussions about it.

11 Q. How do you practice your
12 religion at the spiritual tables?

13 MR. FINI: Objection.

14 A. Well, activities include telling
15 people -- by telling the truth, giving out
16 fliers and also to broadcast or transmit
17 positive thoughts, and sometimes when
18 people accept then they would join into
19 our worship.

20 (Continued on next page.)

21

22

23

24

25

EXHIBIT 10

EXCERPTS OF DEPOSITION OF LINA CUI

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF NEW YORK

INDEX NO. 15-CV-1046

-----x

ZHANG Jingrong, SHOU Yanhua, ZHANG Peng,
ZHANG Cuiping, WEI Min, LO Kitsuen, LI
Xiurong, CAO Lijun, HU Yang, GAO Jinying,
CUI Lina, XU Ting, and BIAN Hexiang,
Plaintiffs,

- against -

Chinese Anti-Cult World Alliance (CACWA),
Michael CHU, LI Huahong,
WAN Hongjuan, ZHU Zirou, and DOES
1-5 Inclusive,
Defendants.

-----x

October 5, 2016

9:52 a.m.

VIDEOTAPE DEPOSITION of CUI LINA,
taken by the Defendants, pursuant to
notice, held at the offices of Veritext
Legal Solutions, 1250 Broadway, New York,
New York, before Debbie Saromatidis, a
Notary Public of the State of New York.

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APPEARANCES:

HUMAN RIGHTS LAW FOUNDATION

Attorneys for Plaintiffs

1615 L Street, NW, Suite 1100

Washington, D.C. 20036

BY: TERRI MARSH, ESQ.

CATAFAGO FINI, LLP

Attorneys for Defendants Chinese

Anti-Cult World Alliance, Michael Chu,

and Zhu Zirou

The Empire State Building

350 Fifth Avenue, Suite 7412

New York, New York 10118

BY: THOMAS M. FINI, ESQ.

ALSO PRESENT:

JAMES LING, Interpreter

DEVERELL WRITE, VIDEOGRAPHER

DANA CHAN

1 LINA

2 (Recess taken.)

3 THE VIDEOGRAPHER: We are back
4 on the record. The time on video monitor
5 is 4:23 p.m. This starts media 4.

6 Q. How many hours a day do you
7 practice Falun Gong?

8 A. The gong --

9 THE INTERPRETER: G-O-N-G.

10 A. -- I practice for two hours a
11 day.

12 Q. And what is that? Describe what
13 that is?

14 A. Doing the exercises, the
15 movements and meditate.

16 Q. Does your practicing Falun Gong
17 give you a sense of inner peace?

18 A. I feel quite peaceful, quite
19 comfortable after I practice.

20 Q. And you practice every day,
21 correct?

22 A. Yes.

23 Q. So, overall, you have -- is it
24 correct that you have a feeling of overall
25 inner peace?

1 LINA

2 A. Yes.

3 Q. Do you live with anybody?

4 A. I live with my daughter or
5 daughters.

6 Q. Okay. Do you travel sometimes
7 outside of New York to go to Falun Gong
8 events?

9 A. I did not participate in other
10 Falun Gong events, but I did travel to
11 another state.

12 Q. So on your typical week -- on a
13 typical week, please explain to me the
14 different Falun Gong locations and
15 activities you attend on a typical week?

16 A. Are you talking about me?

17 Q. Yes.

18 A. Me individually?

19 Q. You individually.

20 A. I would go to Taiwan association
21 once to learn Fa.

22 Q. When you say once, once a week?

23 A. Yes, once a week.

24 Q. And how did you get there?

25 A. I walk. I walk to the

1 LINA

2 content -- a paragraph, and try to
3 comprehend the whole thing. That's
4 number one. Secondly, because I am not
5 in the IT industry, so I cannot answer the
6 question. I am only a very simple
7 person, a peaceful person. I follow the
8 rule of the truthfulness, tolerance and
9 forbearance as stated in the book of Zhuan
10 Falun.

11 Q. And the jury will see that you
12 are avoiding my question because I am not
13 asking you to be an IT expert. That's
14 just silly. I am not asking you that.
15 I am asking you whether you heard Li
16 Hongzhi talk about cell phones. You
17 don't need to be an IT expert to remember
18 whether he spoke about cell phones, and we
19 all know that.

20 So I am asking you again. Did
21 he speak about cell phones? I am not
22 asking you for IT expertise.

23 MS. MARSH: Objection.
24 Objection.

25 A. I disagree with your point of

Page 22

1 LINA

2 Ms. Marsh said, but I am going to move on.

3 Q. Do you volunteer to be at the
4 tables that are in Flushing on or around
5 Main Street?

6 A. Yes.

7 Q. Okay. How often do you come
8 and go to the spiritual center which is
9 across from the library on Main Street?

10 A. In general, I would go there two
11 or three times a week.

12 Q. Do you come and go to the
13 spiritual center whenever you choose? Are
14 you free to come and go whenever you
15 choose?

16 A. It is my choice.

17 Q. Has anybody, any person ever
18 stopped you from coming and going whenever
19 you choose to the spiritual center?

20 MS. MARSH: Objection.

21 A. The spiritual center has not
22 found anybody who tried to prevent anybody
23 from going in and out of the building.

24 Q. Okay. Are you happy that in the
25 United States you have this freedom to

Page 23

1 LINA

2 wake up and walk where ever you want
3 including Falun Gong -- to practice Falun
4 Gong? Are you happy with that freedom?

5 MS. MARSH: Objection.

6 A. Yes, I am quite happy about it.

7 Q. Are you also happy when there is
8 a dispute like we have in this case we can
9 just sit down like we are now and try to
10 figure out the facts without any yelling?

11 MS. MARSH: Objection. I want
12 to be able to say objection before she
13 answers. I didn't mean to interrupt.

14 MR. FINI: Okay. That's fine.

15 A. Your question, I really don't
16 understand the question.

17 Q. That's fine. I'll withdraw the
18 question.

19 When you -- how often do you go
20 to the tables on Main Street? How often
21 are you actually at the tables doing
22 volunteer work?

23 A. I go to spiritual table two or
24 three times a week.

25 Q. And how many hours during the

1 LINA

2 agree them all, and there is none that I
3 disagree with them.

4 Q. Okay. Have you -- did you go to
5 Barclay's Center when Li Hongzhi visited
6 New York this year and see him in
7 Barclay's Center in Brooklyn?

8 A. Are you talking about -- are you
9 referring to auditorium you are talking
10 about?

11 Q. Do you live in New York?

12 A. Yes.

13 Q. You live in Queens?

14 A. I live in Flushing.

15 Q. Is Flushing in Queens?

16 A. Possibly it is in Queens.

17 Possibly.

18 Q. Do you know that we are in
19 Manhattan right now? We are in the
20 borough of Manhattan?

21 A. Yes, I do.

22 Q. And do you know that there is
23 another borough called Brooklyn?

24 A. Yes, I do.

25 Q. You do know Brooklyn?

1 LINA

2 from your home?

3 A. Walking. I walk.

4 Q. Now, when you go to the tables,
5 are you practicing Falun Gong or are you
6 mostly handing out materials at the tables
7 at the five tables in Flushing?

8 MS. MARSH: Objection.

9 A. Over there I practice -- over
10 there I practice. I practice my religion
11 and I pray, and over there I try to
12 introduce -- to introduce people the Falun
13 Gong, and also I pass out the fliers and
14 about how the Chinese communist party
15 persecute Falun Gong and how the Chinese
16 communist party harvest organs.

17 Q. And what is the prayer? How do
18 you pray? What do you say?

19 A. This is one way of -- of
20 cultivation. This is one way to get rid
21 of the bad karma.

22 Q. What I am trying to understand
23 is I was raised Catholic, and there are
24 prayers, and what they are actually -- you
25 actually memorize them. They are actual

1 LINA

2 Taiwanese association.

3 Q. From your home?

4 A. Uh-huh.

5 Q. How long is the walk?

6 A. Ten minutes.

7 Q. And you live in Flushing,

8 Queens?

9 A. That place, that place I have a
10 problem with the English name. It is not
11 too far away from the Taiwanese
12 association, which is located behind Zhong
13 Hua --

14 THE INTERPRETER: Z-H-O-N-G
15 H-U-A.

16 A. -- supermarket.

17 Q. You live -- you live in -- do
18 you live in Flushing?

19 A. Yes, I do live in Flushing.

20 Q. And you walk once a week to the
21 Taiwanese Cultural Center to practice
22 Falun Gong, correct?

23 A. Yes. To learn the Fa, to
24 practice, to pray.

25 Q. Okay. And where else do you go

Page 176

1 LINA

2 The first question is: Did you
3 fa zhen yen at the spiritual -- at the
4 Falun Gong spiritual tables?

5 A. Yes, silently. Yes. I did
6 that some time.

7 Q. Is that part of your religious
8 practice?

9 MR. FINI: Objection.

10 A. Yes.

11 Q. And do you look inward, look
12 inward when you're at the tables walking
13 and sitting, distributing materials? Do
14 you look inward?

15 MR. FINI: Objection.

16 A. Yes, I will. I do that.

17 Q. Okay. Is that part of your
18 religious practice?

19 MR. FINI: Objection.

20 A. Yes.

21 Q. And do you give out religious
22 materials?

23 A. Yes, I do.

24 MR. FINI: Objection.

25 Q. And is that part of your

Page 177

1 LINA

2 religious practice?

3 A. Yes.

4 MR. FINI: Objection.

5 Q. Okay. You've used the word
6 cultivation throughout your answer to
7 questions today. Would you please define
8 cultivation, which is xiu lian? This is
9 the Chinese.

10 MR. FINI: Objection.

11 MS. MARSH: I am just trying to
12 move along here.

13 A. Xiu lian. Cultivation is follow
14 the universal principal of truthfulness,
15 benevolence and forbearance, and also you
16 practice inward and pray to become a
17 sincere, kind, and forbearing person.

18 Q. Is there a difference between
19 xiu lian, which is cultivation and
20 practicing exercises, and I've got both of
21 those in Chinese? You can look at it here
22 if you would like.

23 MR. FINI: Objection.

24 A. They are the same.

25 Q. Practicing the exercise is the

EXHIBIT 11

EXCERPTS OF DEPOSITION OF PENG ZHANG

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF NEW YORK

-----X

ZHANG Jingrong, ZHOU Yanhua, ZHANG Peng,
ZHANG Cuiping, WEI Min, LO Kitsuen, CAO
Lijun, HU Yang, GUO Xiaofang, GAO Jinying,
CUI Lina, XU Ting, BIAN Hexiang,

Plaintiffs,

- against- 15 CV 1046 (SLT) (VMS)

Chinese Anti-Cult World Alliance (CACWA),
Michael CHU, LI Huahong, WAN Hongjuan,
ZHU Sirou, and DOES 1-5 Inclusive,

Defendants.

-----X

May 13, 2016

10:26 a.m.

Videotaped deposition of Plaintiff

Peng Zhang, held at the offices of Catafago
Fini LLP, The Empire State Building, 350
Fifth Avenue, New York, New York, pursuant
to Notice, before NANCY SORENSEN, a Notary
Public of the State of New York.

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A P P E A R A N C E S:

HUMAN RIGHTS LAW FOUNDATION

Attorneys for Plaintiffs

1615 L Street, NW, Ste. 1100

Washington, D.C. 20036

BY: TERRI MARSH, ESQ.

- and -

LAW OFFICES OF DAVID CLEVELAND, ESQ.

1234 Mass Avenue, N.W.

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Washington, D.C. 20005

CATAFAGO FINI LLP

Attorneys for Defendants Chinese Anti-Cult

World Alliance, Michael Chu, Li Huahong and

Zhu Zirou

The Empire State Building

350 Fifth Avenue, Suite 7412

New York, New York 10118

BY: TOM M. FINI, ESQ.

1

2 A P P E A R A N C E S: (Cont'd)

3

4

5 A L S O P R E S E N T:

6

JIM ROBERTS, VIDEOGRAPHER

7

JARON LIU, INTERPRETER

8

SOPHIA XIE, PREP INTERPRETER

9

PATRICK FENG, INTERPRETER

10

(P.M. ONLY)

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1 P. Zhang

2 came all over the world and gathered together.

3 Q. And when you got to the United
4 States, on average, just -- this is on average
5 during a day, any given day, if you just
6 averaged it, how much time do you spend reading
7 or doing the Falun Gong medication or exercises?

8 A. Are you referring to right now or
9 when you first came in 2014?

10 Q. Start with 2014 and then talk about
11 now?

12 A. So when I came in 2014, I spent a lot
13 of hours trying to study the teachings of Falun
14 Gong, and I want to find out about the truth.

15 So I spent at least a few hours a
16 day. And once I obtained my green card, I was
17 looking for a job and then -- correction, not
18 the green card, it's Social Security card, and
19 then I wanted to find work.

20 And so in 2015, I find full-time job.
21 So afterwards, I don't have too many hours as
22 before, spending time into Falun Gong activities
23 or things. So right now, I average around 1 or
24 2 hours a day.

25 Q. Does -- what word should I use to

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1 P. Zhang

2 A. The communist party propaganda was
3 the same. They wanted to eliminate Falun Gong,
4 this group of people.

5 Q. Does everyone who practices Falun
6 Gong have the same understanding of what the
7 scripture means?

8 MR. FINI: Objection.

9 Q. Religious text?

10 MR. FINI: Objection.

11 A. I believe the understanding would be
12 different. Each person has his own background
13 and the understanding might vary.

14 Q. Has your understanding of the
15 religious texts changed as you've continued to
16 cultivate?

17 MR. FINI: Objection.

18 A. In many aspects, yes.

19 MS. MARSH: For the sake of time, I'm
20 not going ask for an example.

21 Q. Could you define cultivation?

22 A. Cultivation is to cultivate the
23 person's state of mind. That means to read the
24 Dafa books to really understand what Dafa means.

25 The actual criteria of the phrase

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1 P. Zhang

2 truth, benevolent and tolerance. And then to
3 compare your own mind to see with the truth,
4 benevolence and tolerance, to see in which
5 aspect that I am still -- I still need
6 improvement. This is one of the aspects.

7 And the other aspect is the practice
8 of exercise, body movement -- movements. We
9 have five sets of practice, exercises. And one
10 of the -- one set is for the meditation by
11 sitting, meditation.

12 By doing that, one's body will be
13 able to purify naturally and healthier.

14 By practicing these two aspects, a
15 person's, both his or her mind and physical body
16 would be more purified and healthier.

17 Q. In Europe, is Falun Gong a religion?

18 A. Yes.

19 Q. And why?

20 A. Because we believe in God, we believe
21 that God exists in the universe. We read the
22 scripture on a regular basis very often. And we
23 practice, we practice it together and we
24 organize the activities together.

25 For example, we participate in the

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1 P. Zhang

2 Hongzhi say that the survivors of earth's
3 destruction were transported to another planet
4 and brought the other planet's technology to
5 earth?

6 A. No.

7 Q. Have you ever heard Li Hongzhi say or
8 write that ancient Chinese science was and is
9 far superior to modern western science?

10 A. I recall our master once said that
11 the Asian in ancient China, our science was very
12 perspective, and they followed a different path
13 compared to the path that the western science
14 followed.

15 Q. Why do you believe that a man who
16 wrote a book in 1992 has a unique and sole grip
17 on reality when China has existed for thousands
18 of years with so many smart people?

19 A. As a matter of fact, as a
20 practitioner, the person would have his own
21 experience. If you really understand the
22 actions of the -- this doctrine and sincerely
23 practice the -- practice it and try to learn
24 from it, you -- your mind will be highly
25 elevated to a much higher level for purity and

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1 P. Zhang

2 honesty.

3 Q. But why do you believe that a
4 particular movement that one man wrote could be
5 and would be the secret to salvation?

6 MS. MARSH: Objection.

7 A. You mean secret of salvation?

8 Q. To cultivation to --

9 A. As a matter of fact, western people
10 also know that there are many ways of
11 cultivation in the history.

12 In reference to Falun Dafa, he has
13 been passed over from one generation to another
14 directly. It was up to master Li who would like
15 to disclose to the general public for people to
16 practice and other people learn about this, and
17 they realize it's a really practical
18 cultivation, and it would be able to reach to a
19 certain high level of morality in mind.

20 Q. Do you have any friends who tell you
21 that they respect you, but they think that Falun
22 Gong is a little weird?

23 A. Yes.

24 Q. Who?

25 A. In China when I introduce Falun Gong

1 P. Zhang

2 Q. When is the first time you saw this
3 complaint, what date approximately?

4 A. This, I don't remember which date
5 from last year. I don't recall.

6 Q. But your -- did you receive a
7 translated version of this complaint?

8 A. I have a fellow believer that
9 translated for me, but I -- I only saw the
10 English complaint, not the Chinese one.

11 Q. What's the name of the fellow
12 believer?

13 A. I think the name is Shen S-H-E-N.

14 Q. And what is the date that you were
15 allegedly assaulted?

16 A. In 2014, July 19th.

17 Q. And were you living in Flushing at
18 that time?

19 A. Yes.

20 Q. And at that time, how often did you,
21 in July, how often were you going to Falun Gong
22 locations, how often, would you go every day?

23 MS. MARSH: Objection.

24 A. At least three to four times a week.

25 Q. And where would you go three to four

1 P. Zhang

2 times a week?

3 A. What I mentioned to you before at the
4 Main Street, both at the office and also at the
5 Taiwanese Association where we learned together.

6 Q. And when did you move to Middletown?

7 A. In January of 2015.

8 Q. And until January 2015, in other
9 words, through the end of 2014, is it fair to
10 say that you went to Falun Gong locations in
11 Flushing three or four times a week?

12 A. Yeah, pretty much.

13 Q. And are there five Falun Gong tables
14 in Flushing, Queens?

15 A. Yeah, I know we have five.

16 Q. And did you -- would you go to more
17 than one of those tables during the week?

18 A. Yes, I went to different tables.

19 Q. Can you describe what exactly
20 happened on July 19, 2014 that you called the
21 assault?

22 A. On that day, July 19th, approximately
23 late in the afternoon, 6 p.m. I was at the Main
24 Street and Roosevelt Street booth. I was
25 handing out flyers to people coming, passing by.

1 P. Zhang

2 A. Yeah, I joined this location in Main
3 Street that we practice together and learn
4 together and do Falun Gong things together.

5 Q. Is there a building where you can
6 meet indoors in Flushing?

7 A. We have a small office in a building
8 and, but when we tried to learn all these Falun
9 Gong things, we meet at the Taiwanese
10 Association.

11 Q. Where is that?

12 A. The location is at Main Street near
13 Northern Boulevard. And we have field booths on
14 Main Street, and one of them I was assaulted at
15 the booth.

16 Q. So what does Falun Gong call the
17 local organization, do they use a word like
18 chapter or a name to identify the local unit?

19 A. We only refer to that office as like
20 the action center. I don't think we have any
21 special name for calling that -- that
22 organization.

23 Q. How many, approximately how many
24 Falun Gong practitioners are members or part of
25 the local Flushing Falun Gong community?

1 P. Zhang

2 A. Normally when we learn together at
3 the Taiwanese Association, we have more people
4 showing up.

5 But usually at like the action center
6 or the office, we have less people, like maybe
7 10 plus and on the booth. Booth also less
8 people.

9 Q. Right, so in the Taiwanese center
10 when there's an event, approximately how many
11 Falun Gong members are part of that community?

12 A. I think maximum we have 200 plus
13 people.

14 Q. And what -- after you got to the
15 United States, please list for me the different
16 types of Falun Gong public activities you
17 participated in?

18 MR. FINI: Get ready to break it up
19 because I may ask him for a list. So start
20 -- so go ahead, go, and then let him --

21 THE INTERPRETER: Okay.

22 A. Mainly we were at the booth handing
23 out flyers to spread out about the truth. And
24 also when we practiced together, we learned
25 about the Falun Gong practice.

1 P. Zhang

2 truth, benevolent and tolerance. And then to
3 compare your own mind to see with the truth,
4 benevolence and tolerance, to see in which
5 aspect that I am still -- I still need
6 improvement. This is one of the aspects.

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8 of exercise, body movement -- movements. We
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22 scripture on a regular basis very often. And we
23 practice, we practice it together and we
24 organize the activities together.

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1 P. Zhang

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14 directly. It was up to master Li who would like
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18 cultivation, and it would be able to reach to a
19 certain high level of morality in mind.

20 Q. Do you have any friends who tell you
21 that they respect you, but they think that Falun
22 Gong is a little weird?

23 A. Yes.

24 Q. Who?

25 A. In China when I introduce Falun Gong

Page 20

1 P. Zhang

2 Q. Yes.

3 A. I'm a Falun Gong believer, and when I
4 was in China, I got abused in China.

5 MR. FINI: All right, this is going
6 to happen all day, this phrase, so I'm going
7 to give it to you. It's F-A-L-U-N G-O-N-G,
8 capital F, capital G, Falun Gong.

9 So can you read back the answer.

10 COURT REPORTER: "I'm a Falun Gong
11 believer, and when I was in China, I got
12 abused in China."

13 Q. What did you put in your application
14 about the abuse, the specifics of the abuse?

15 A. Because I'm a firm believer of Falun
16 Gong, they incarcerated me for a long time.

17 Q. In your application for asylum -- oh,
18 by the way, you have a copy of -- I'm assuming
19 you have a copy of your application for asylum
20 that you submitted to the United States?

21 A. Yes, I have.

22 Q. Okay, and in that application what --
23 when you say you were subjected to abuse, how
24 long in the application to the United States,
25 how long did you say you were abused?

Page 21

1 P. Zhang

2 MS. MARSH: Objection.

3 A. I want to clarify something. When
4 you said, "abused," like how, like the time
5 frame that I was abused or the time frame that I
6 was incarcerated?

7 Q. Well, answer both.

8 A. It start in July of 1999 until I came
9 to the U.S., and when I was incarcerated
10 illegally, I was incarcerated for 11 years.

11 MS. MARSH: I'm sorry, I didn't hear
12 you.

13 COURT REPORTER: "It start in July of
14 1999 until I came to the U.S., and when I
15 was incarcerated illegally, I was
16 incarcerated for 11 years."

17 Q. After you graduated from the
18 university, South China university, how old were
19 you?

20 A. Twenty-three years old.

21 Q. Did you attend another school after
22 that?

23 A. No.

24 Q. Did you study law?

25 A. I self-study.

1 P. Zhang

2 reason the government gave --

3 MR. FINI: It's going to be too long.

4 What you have to do, if it's starting to get
5 too long, you have to raise your hand.

6 Is it too long? I mean you have to
7 raise your hand and do it; all right?

8 Because it just seemed to be a lot.

9 So are you okay with that, that if he

10 -- I would like you not to talk too -- try
11 to break it up, and if you know that you can
12 no longer now get it all, then raise your
13 hand, translate it, and then he'll pick up;
14 okay?

15 Q. So what was the reason for the second
16 -- what is the reason that the government gave
17 for the second time you were detained?

18 A. The second time they didn't really
19 have any proof of documents of what -- what was
20 the reasoning behind.

21 After the first incident happened, I
22 went back to my university, and there's a
23 communist university that they have these, what
24 you call, security personnels.

25 Those security personnels came to me

1 P. Zhang

2 and asked me to give up my religion, to give up
3 practicing Falun Gong and, but I refused.

4 So later on then they put me in
5 detention again.

6 Q. And did they give a purported reason,
7 did they at least try to come up with some
8 reason to detain you that you're aware of?

9 A. No, nothing.

10 Q. And then in between the first and the
11 second detention, where were you living?

12 A. The South China University.

13 Q. Is housing? In other words, the
14 university has housing; is that correct?

15 A. Yes, they have this building
16 specialized for all the workers, and inside that
17 building, they have security guards that belong
18 to the university.

19 Q. And does -- did the university pay
20 for your housing and food?

21 A. No, I pay on my own from my salary.

22 Q. Then after the second arrest --
23 second detention, did you go back to the
24 university living facility?

25 A. No, I went back home to my parent's

EXHIBIT 12

EXCERPTS OF DEPOSITION OF JINGRONG ZHANG

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF NEW YORK

INDEX NO. 15-CV-1046

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ZHANG Jingrong, ZHOU Yanhua, ZHANG Peng,
ZHANG Cuiping, WEI Min, LO Kitsuen, LI
Xiurong, CAO Lijun, HU Yang, GAO Jinying,
CUI Lina, XU Ting, and BIAN Hexiang,
Plaintiffs,

- against -

Chinese Anti-Cult World Alliance (CACWA),
Michael CHU, LI Huahong,
WAN Hongjuan, ZHU Xirou, and DOES
1-5 Inclusive,
Defendants.

-----x

October 19, 2016

9:23 a.m.

VIDEOTAPE DEPOSITION of JING
RONG ZHANG, taken by the Defendants,
pursuant to notice, held at the offices of
Veritext Legal Solutions, 1250 Broadway,
New York, New York, before Debbie
Saromatidis, a Notary Public of the State
of New York.

1

2 A P P E A R A N C E S:

3

4 HUMAN RIGHTS LAW FOUNDATION

5 Attorneys for Plaintiffs

6 1875 K Street, NW

7 Washington, D.C. 20036

8 BY: TERRI MARSH, ESQ.

9

10 CATAFAGO FINI, LLP

11 Attorneys for Defendants Chinese

12 Anti-Cult World Alliance, Michael Chu,

13 and Zhu Zirou

14 The Empire State Building

15 350 Fifth Avenue, Suite 7412

16 New York, New York 10118

17 BY: THOMAS M. FINI, ESQ.

18

19 ALSO PRESENT:

20 ANNIE LEE, Interpreter

21 RON MARRAZZO, VIDEOGRAPHER

22 DANA CHAN

23

24

25

1 ZHANG

2 of interference from people, people now in
3 this lawsuit. They are defendants.

4 Q. Okay. So let's talk about your
5 involvement with Falun Gong.

6 MR. FINI: Could you translate
7 that.

8 Q. What places do you go to to
9 engage in Falun Gong activities of any
10 kind?

11 A. Are you asking about in U.S.,
12 right?

13 Q. Yes. Currently week to week in
14 the past year I would like you to describe
15 generally the places you go to to engage
16 in any type of Falun Gong activity.

17 A. Most time I spend the time to go
18 to the spiritual center, and then also
19 sometimes I also go to Taiwan Community
20 Center on Northern Boulevard. Over
21 there, I practice Falun Gong with other
22 people together, and also I also go to
23 spiritual center to learn the Fa --

24 THE INTERPRETER: F-A.

25 A. -- and then to practice. And

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1 ZHANG

2 also we attend some sort of protests, some
3 sort of protests because of Chinese
4 communist party opposition, suppression,
5 and also parade.

6 Q. Okay. So after you came to the
7 United States in 2006, what year did you
8 start to engage in all of the activities
9 that you just described?

10 A. 2008 I started.

11 Q. Okay. So am I correct that
12 starting in 2008 --

13 A. Wait. I want to -- so in
14 20 -- 2008 I attended more activities
15 because those activities were in Flushing
16 area. However, in the year of 2006 when
17 I first came to America, I went to my
18 daughter's home in New Jersey. So in New
19 Jersey there was fewer activities, but in
20 the year 2008 when I was in Flushing they
21 have a lot of -- a lot of activities.

22 Q. Okay. And I want to thank you
23 for being very clear. You are very
24 clearly answering my questions, and I
25 appreciate that.

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1 ZHANG

2 A. Thank you.

3 Q. That helps me understand why
4 2008 was a change, and in 2008 where did
5 you move to in Flushing?

6 A. I lived in Flushing. I lived
7 in Flushing.

8 Q. What was the address?

9 A. So it is close to Main Street.
10 The address is 39-27 34th Avenue, second
11 floor.

12 Q. And do you still live in
13 Flushing?

14 A. Yes, I still live there. I
15 never moved. Still there.

16 Q. So since 2008 you have been at
17 that location?

18 A. Yes. Yes. I am a very steady
19 person.

20 Q. Okay.

21 A. Steady.

22 Q. And am I -- is it correct that
23 starting in 2008 because you moved to
24 Flushing you began on a regular basis to
25 engage and travel to the Falun Gong events

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1 ZHANG
2 that you've mentioned to us earlier?
3 A. Yes. Yes.
4 Q. In 2015, at the beginning of
5 2016 -- 2015, let's just start -- let's
6 just take January 2015.
7 How many days a week at the
8 beginning of 2015 would you go to one
9 Falun Gong event or another? If you took
10 seven days out of the week, how many days
11 typically would you be traveling to a
12 Falun Gong event of some sort?
13 A. Four to five days.
14 Q. Okay. Why would that for two
15 days you would not be traveling to a Falun
16 Gong event? What is the reason for that?
17 A. Well, I stayed at home to learn
18 the Fa.
19 THE INTERPRETER: F-A.
20 A. And also I also happen to take
21 care of my life, for example, doing
22 laundry, purchasing groceries. Like my
23 personal life.
24 Q. That makes total sense to me.
25 I work -- I come to the city five days a

Page 15

1 ZHANG
2 week, and on weekends I am with my family.
3 So that makes sense to me.
4 A. Yes. Yes. Very good.
5 Q. So if we went back to 2014, was
6 your routine of going to Falun Gong events
7 similar in that in 2014 you typically
8 would travel to Falun Gong events four to
9 five days a week?
10 A. Correct. It become a routine
11 normally. I just have the same routine.
12 Q. I understand.
13 MR. FINI: Could you translate
14 when I say something like I understand.
15 Q. So I just want to get a full
16 picture of your dedication to Falun Gong
17 by listing all of the events. So I am
18 going -- so I am going to start to list
19 events, and I am going to ask you
20 specifically about some that I understand
21 you engage in.
22 A. Okay.
23 Q. So do you go to any public areas
24 including parks to do any Falun Gong
25 movements or exercises with other people?

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1 ZHANG
2 A. So every morning I actually
3 practice gong in the morning between
4 a.m. to 7:30 a.m. in a small park.
5 Q. Okay. And where is that park?
6 A. Well, that little park was
7 located between 34th and -- 34th and 35th
8 Street behind where I live about a
9 five-minute walk.
10 MR. FINI: Okay. Now, the
11 translator said that park was located, and
12 I am asking all of her practices and
13 locations.
14 Q. So to clarify, is that park
15 still there?
16 A. Yes. I still go there every
17 day.
18 Q. Okay.
19 A. Unless rain or even heavy rain
20 falls. For small rainfall we will be
21 there.
22 Q. Okay. So is it correct that
23 generally from 2014 through the present
24 you've been going to this park to practice
25 gong every day from 6:30 to 7:30 a.m.?

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1 ZHANG
2 A. Yes. Sometimes -- yes,
3 sometimes I will stay there until
4 a.m. If I practiced the whole set of five
5 exercise, it would require two hours.
6 Q. Okay. And did you testify that
7 that is a five-minute walk from your home?
8 A. Yes, maximum five minutes.
9 Q. And do you in fact get there by
10 walking from your home to that location?
11 A. Yes, by walking.
12 Q. Okay. And is another Falun
13 Gong activity you engage in going to any
14 of the five tables that Falun Gong have
15 near Main Street, Flushing?
16 A. Yes. Well, we call that
17 spiritual table.
18 Q. Okay. Are there five spiritual
19 tables in Flushing?
20 A. Yes.
21 Q. Okay. And is there a spiritual
22 center in Flushing?
23 A. Yes.
24 Q. And where is the spiritual
25 center located?

Page 18

1 ZHANG

2 A. On Main Street opposite to the
3 Queens Library.

4 Q. And is it correct that the
5 spiritual center as opposed to the tables
6 is where materials -- the tables, the
7 brochures are stored, and then Falun Gong
8 practitioners take them from the spiritual
9 center and then open them and set up the
10 five tables, which are stored at the
11 spiritual center?

12 A. Correct. Correct.

13 That -- just like what you said.

14 Q. Okay. And because your
15 attorney requested it, I am -- and we had
16 so many depositions I am doing two
17 depositions today, and I appreciate you
18 answering questions because I am going to
19 hopefully be done, you know, by 1 o'clock,
20 and we will just be done, so I appreciate
21 you just answering questions. So I want to
22 thank you because you are being very
23 clear.

24 Okay. How many -- since 2014
25 on average how many days a week do you go

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1 ZHANG

2 to the tables in -- the Falun Gong tables
3 in Flushing?

4 A. You're talking about the year
5 2014? 2014, right?

6 Q. Well, so your routine of going
7 to the tables may be similar from 2014 to
8 the present or it may have slightly
9 changed, which is part of my question.

10 My question is from 2014 to
11 2016, is there a general routine or an
12 approximate number of times that you go to
13 the tables per week, and if that changed a
14 little bit over time feel free to explain
15 that?

16 A. Because I am getting old so
17 presently I went -- I go there less. I
18 would say a day or two less than before.

19 Q. And you -- when you would go a
20 little bit more, is it correct you would
21 go a little bit more frequently in 2014
22 than presently?

23 A. Yes, of course. For
24 example -- so, yes, as a matter of fact,
25 you know, in the year 2008, right, I went

1 ZHANG

2 there very often, every day because I
3 loved to talk to everybody about the
4 truth, about how to be a nice person.

5 Q. So in 2014 approximately how
6 many days a week did you go to the tables
7 in Flushing?

8 A. Four to five days at a time.

9 Q. Okay. And in 2015 how many
10 did -- approximately how many days a week
11 would you go to the tables in Flushing?

12 A. Last year five days per week.

13 Q. And 2016?

14 A. Four days this year.

15 Q. You testified because you are
16 getting a little bit older you've slowed
17 down a little bit the number of times you
18 go to the tables, but is it correct that
19 despite your age you still go every day to
20 the park in the morning; is that correct?

21 A. Yes, every day practice, and I
22 feel good, and I feel healthy after
23 practice, very good.

24 Q. I run when I can, and it makes
25 me feel so much better. So I understand

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1 ZHANG

2 Q. Okay. So you have a claim
3 against --

4 A. Because I wanted to go for a --

5 Q. Okay.

6 A. -- for some time already.

7 Q. You have a claim against Wan,
8 Ms. Wan in this lawsuit, correct?

9 A. Yes.

10 Q. Okay. And my understanding is
11 that you allege that she threatened you,
12 correct?

13 A. Yes.

14 Q. Okay. Despite that threat, even
15 though that threat was made, am I correct
16 that you still regularly go to all of the
17 activities even after that threat that
18 you've described today; is that correct?

19 A. Yes, I still went there because
20 that is my belief.

21 Q. Okay. You can -- we can now
22 break. Thank you.

23 THE VIDEOGRAPHER: Stand by.
24 It is approximately 10:18 a.m. We are
25 going off the record.

1 ZHANG

2 A. Yes, because now -- yes, because
3 now I am retired. I have no job, so I
4 have no stress. For me right now, I
5 would like to cultivate myself on the
6 principles of cheerfulness, truthfulness,
7 goodness, and also the forbearance and how
8 to cultivate myself to be a better person.

9 Q. Okay. When you go to
10 this -- the Taiwanese center, Taiwanese
11 Cultural Center, what activities do you
12 engage in there once a week?

13 A. So for the activity in the
14 Taiwan Cultural Center, we basically went
15 there to learn -- go there to learn Fa.

16 THE INTERPRETER: F-A.

17 A. We basically practice and learn
18 things, ideas mostly from the book called
19 Zhuan Falun.

20 THE INTERPRETER: Z-H-U-A-N
21 F-A-L-U-N.

22 A. And we communicate with each
23 other. We learn. We talk, discuss about
24 the Fas from book.

25 Q. And do you -- do you pray --

1 ZHANG

2 MR. FINI: Strike that.

3 Q. Do you understand what I mean by
4 the word pray?

5 A. So what I understand you mean by
6 pray, you mean you know people spend a
7 time they think about wrongful doing, and
8 then they would try -- in front of their
9 God they would ask for forgiveness, and
10 then they would ask their God to bless
11 them. That is my understanding of the
12 word. That is my understanding the word
13 pray.

14 Q. Let's work with what she -- what
15 you just described, that idea that you
16 just described. I want to use that idea.
17 That's helpful.

18 Do you do that -- do you pray at
19 the Taiwanese Cultural Center?

20 A. Yes. We have a particular term
21 instead of using the word pray. We will
22 say that we initiate a right thinking.

23 Q. Okay. So what happens? Can
24 you describe what happens in the Taiwanese
25 Cultural Center?

1 ZHANG

2 A. So when I mentioned that
3 particular term to initiate a right
4 thinking, this particular part everybody
5 had to do it by themselves. It started
6 from a person silently sitting down, and
7 then that person would have the inner
8 thought thinking and evaluating his own
9 doing whether or not they were deviating
10 from the main philosophy of Falun Gong.

11 Q. Okay.

12 A. I'm talking about the
13 truthfulness, compassion, forbearance,
14 these three philosophies and think about
15 how to be a good person, how to not
16 deceive people. How to be nice to
17 people, and with that self-examination
18 this is a part to cultivate the inner
19 self, and then if during the self
20 examination we found that we have desire,
21 for example, greed, something bad, we have
22 to discard all these feelings.

23 Q. And do you --

24 A. And more. I have more to say.

25 Q. Okay.

Page 40

1 ZHANG

2 A. So I have to further explain to
3 you during the time when I think about
4 myself I will also have to think about
5 my -- how I can treat people nicely.
6 Everyone, anyone how I can treat them
7 nicely. That's the meaning of
8 truthfulness, how to be truthful to
9 others.

10 I have more. I want to
11 continue. So also I am talking about
12 forbearance. I would think about what the
13 master teaching. My master teach me when
14 people hit me I would not fight back.
15 When people curse me, I would not return
16 words. So the heart have to be very,
17 very big. That could accommodate a lot
18 of different things. We always look at
19 our self-weakness, always look at the
20 wrongdoing of the self but never look at
21 the weakness of others, never look at the
22 wrongdoing of others. This is the
23 forbearance, the philosophy.

24 So also I would -- when I see
25 two people fight, I would first

Page 41

1 ZHANG

2 self-examine myself to see whether or not
3 I also have that problem, and then I would
4 check whenever I have some sort of
5 attachment, desire emotional wrongdoing
6 and I would try to detach all those bad
7 thinking how to become a nice, nice person
8 and how to cultivate my inner self.

9 Q. Okay. And when you go to the
10 park in the mornings, how does that
11 activity differ from what you're doing at
12 the Taiwanese Cultural Center?

13 A. Well, in the park we focus on
14 practicing the Gong.

15 THE INTERPRETER: G-O-N-G.

16 A. Basically it is exercise, the
17 inner parts and also the outer part.

18 Q. So how does that differ from
19 what you're doing -- the practicing of the
20 Gong, how does that differ from what you
21 are doing at the Taiwanese Cultural
22 Center?

23 A. No, in Taiwan Cultural Center we
24 concentrate three things. One is I call
25 to initiate right thinking first part.

1 ZHANG

2 in Flushing is communicating ideas to the
3 public, correct?

4 A. Yes. Yes. We want to deliver
5 the idea that what -- you know, what Falun
6 Gong is about. It is about philosophy of
7 truthfulness, compassion, forbearance, and
8 second thing we also want to expose to
9 public because we are innocent people that
10 practice Falun Gong, but that we are being
11 suppressed by Chinese regime.

12 Q. Okay. So does part of your
13 communication at the five tables include
14 anticommunist China ideas?

15 A. No, not at all because we
16 actually -- it is a group of
17 self-cultivation, so we -- we would not be
18 interested to expose the corruption, the
19 moral value of the Chinese regime. We
20 are not interested to talk about those
21 subjects. We only want to open to the
22 public about how they suppress us, how
23 they would like to destroy us, ruin us.
24 Because we are a group that talking about
25 self-cultivation, we are not having any

1 ZHANG

2 they have punishment.

3 Q. Okay. And why don't you think
4 that Falun Gong is a xie jiao? Why is it
5 not a xie jiao?

6 A. Okay. Because of the philosophy
7 of Falun Gong we are talking about three
8 main philosophy, truthfulness, compassion,
9 forbearance. Do you consider these three
10 philosophies evil? Well, they want good
11 people to be good person, not just good
12 but better than regular good people. We
13 have to discard all the desires such as
14 greed, sexual desire, all kind of bad
15 attachment. We have to discard in order
16 to cultivate, in order to be nice and
17 good.

18 Q. But what about if Li wants to
19 focus on some of the other things Li
20 Hongzhi has taught about such as separate
21 heavens for separate races and aliens,
22 technology from other planets, and she
23 considers those ideas dangerous and evil?
24 Why do you want to stop her from
25 expressing her opinion that it is evil in

1 ZHANG

2 A. Yes, part of it.

3 Q. And do you distribute materials
4 about the nature of Falun Gong at your
5 spiritual tables?

6 MR. FINI: Objection.

7 A. Yes, instruct them about the
8 practice of Falun Gong, about the
9 free -- philosophy of Falun Gong, the
10 truthfulness, compassion, forbearance, and
11 also how to be a good person. This is
12 also essential part of cultivation.

13 Q. Okay. Good. Thank you.

14 There was some question about
15 the meaning of xie jiao and the meaning of
16 xie by itself and the meaning of jiao by
17 itself.

18 Do you remember that?

19 A. Yes.

20 Q. And do you recall being asked
21 what jiao means and what --

22 A. And I answer him religion is a
23 part of cultivation.

24 Q. Okay. Did you describe jiao as
25 as meaning just an organization?

1 ZHANG

2 A. In my heart he is a deity or
3 God.

4 Q. Okay. And in his writings have
5 you seen him talking about how evil people
6 will be destroyed?

7 A. He did not say directly just
8 like what you say. However, he said that
9 people get awarded because of the nice
10 things that they do. People get
11 punishment because of the bad things that
12 they did.

13 Q. Okay. One of the things I read
14 was that -- it's in a book, and he says
15 "The evil ones should think twice about
16 their flagrant savagery."

17 MR. FINI: Translate that.

18 MS. MARSH: Objection.

19 Q. "When heaven and earth are
20 bright again, down to the boiling caldron
21 they go."

22 Am I correct that you have read
23 things that Li Hongzhi has said like that,
24 that there will be a terrible fate for
25 evil people? Correct?

1 ZHANG

2 Q. So you do -- you want to
3 stop -- in this lawsuit part of the reason
4 for this lawsuit is to stop him from
5 saying xie jiao?

6 A. Yes. Correct. Also no more
7 physical action, no more physical
8 disturbances.

9 Q. But am I correct that you are
10 okay -- you're not trying to stop him from
11 just using the word evil in Chinese
12 against Falun Gong? It is xie jiao; is
13 that correct? It is that special word xie
14 jiao?

15 A. Yes. Yes, because in America we
16 are a religion. We are a religion, so
17 that is why we cannot be named as xie
18 jiao. In China the reason why we were
19 being named as xie jiao, that's because of
20 Jiang Zemin. He imposed this term to us
21 as a stigma, and that started the eventual
22 crack down, suppression, cruelty,
23 detention, and also the live harvesting of
24 organs.

25 Q. But none of those extreme

1 ZHANG

2 for him an answer to his follow-up
3 question the -- what Fa /SHEPB /KWREPB
4 means? Do you remember that?

5 MR. FINI: Objection --

6 MS. MARSH: Just stop there.

7 Let me rephrase.

8 Q. You also in a follow-up question
9 described what fa zheng nian encompasses?

10 A. Yes.

11 Q. Okay. And you said that fa
12 zheng nian is part of your religious
13 practice; is that right?

14 MR. FINI: Objection.

15 A. Part of the cultivation.

16 Q. And --

17 A. Very, very important content of
18 cultivation.

19 Q. And do you fa zheng nian at the
20 spiritual tables in Flushing?

21 MR. FINI: Objection.

22 A. Yes, any time very often.

23 Q. Okay. And is distributing
24 religious materials part of your religion?

25 MR. FINI: Objection.

1 ZHANG

2 The second part to study the Fa.

3 THE INTERPRETER: F-A.

4 A. The third is communication
5 between members just to share the ideas
6 and learn from each other.

7 Q. Okay. And in contrast to the
8 park and the Taiwanese Cultural Center, is
9 it correct that when you go to the tables
10 in Flushing you are not practicing Falun
11 Gong, but you are communicating ideas to
12 the public; is that correct?

13 A. Yes. Yes, for my belief.

14 Q. Okay. And --

15 A. Well, one more thing. Because
16 we are innocent victims under the Chinese
17 regime, so we would like to expose those
18 facts to the public, too.

19 Q. Okay. So what you just
20 described, exposing the facts, that's part
21 of the activity at the -- at the five
22 tables in Flushing, correct?

23 A. Yes, by distribution of fliers.

24 Q. So you would agree that the
25 activity that you are doing at the tables

1 ZHANG

2 A. Yes, because now -- yes, because
3 now I am retired. I have no job, so I
4 have no stress. For me right now, I
5 would like to cultivate myself on the
6 principles of cheerfulness, truthfulness,
7 goodness, and also the forbearance and how
8 to cultivate myself to be a better person.

9 Q. Okay. When you go to
10 this -- the Taiwanese center, Taiwanese
11 Cultural Center, what activities do you
12 engage in there once a week?

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14 Taiwan Cultural Center, we basically went
15 there to learn -- go there to learn Fa.

16 THE INTERPRETER: F-A.

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19 Zhuan Falun.

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21 F-A-L-U-N.

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23 other. We learn. We talk, discuss about
24 the Fas from book.

25 Q. And do you -- do you pray --

1 ZHANG

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3 public, correct?

4 A. Yes. Yes. We want to deliver
5 the idea that what -- you know, what Falun
6 Gong is about. It is about philosophy of
7 truthfulness, compassion, forbearance, and
8 second thing we also want to expose to
9 public because we are innocent people that
10 practice Falun Gong, but that we are being
11 suppressed by Chinese regime.

12 Q. Okay. So does part of your
13 communication at the five tables include
14 anticommunist China ideas?

15 A. No, not at all because we
16 actually -- it is a group of
17 self-cultivation, so we -- we would not be
18 interested to expose the corruption, the
19 moral value of the Chinese regime. We
20 are not interested to talk about those
21 subjects. We only want to open to the
22 public about how they suppress us, how
23 they would like to destroy us, ruin us.
24 Because we are a group that talking about
25 self-cultivation, we are not having any

1 ZHANG

2 A. So every morning I actually
3 practice gong in the morning between
4 a.m. to 7:30 a.m. in a small park.

5 Q. Okay. And where is that park?

6 A. Well, that little park was
7 located between 34th and -- 34th and 35th
8 Street behind where I live about a
9 five-minute walk.

10 MR. FINI: Okay. Now, the
11 translator said that park was located, and
12 I am asking all of her practices and
13 locations.

14 Q. So to clarify, is that park
15 still there?

16 A. Yes. I still go there every
17 day.

18 Q. Okay.

19 A. Unless rain or even heavy rain
20 falls. For small rainfall we will be
21 there.

22 Q. Okay. So is it correct that
23 generally from 2014 through the present
24 you've been going to this park to practice
25 gong every day from 6:30 to 7:30 a.m.?

1 ZHANG

2 A. Yes. Sometimes -- yes,
3 sometimes I will stay there until
4 a.m. If I practiced the whole set of five
5 exercise, it would require two hours.

6 Q. Okay. And did you testify that
7 that is a five-minute walk from your home?

8 A. Yes, maximum five minutes.

9 Q. And do you in fact get there by
10 walking from your home to that location?

11 A. Yes, by walking.

12 Q. Okay. And is another Falun
13 Gong activity you engage in going to any
14 of the five tables that Falun Gong have
15 near Main Street, Flushing?

16 A. Yes. Well, we call that
17 spiritual table.

18 Q. Okay. Are there five spiritual
19 tables in Flushing?

20 A. Yes.

21 Q. Okay. And is there a spiritual
22 center in Flushing?

23 A. Yes.

24 Q. And where is the spiritual
25 center located?

1 ZHANG

2 to the tables in -- the Falun Gong tables
3 in Flushing?

4 A. You're talking about the year
5 2014? 2014, right?

6 Q. Well, so your routine of going
7 to the tables may be similar from 2014 to
8 the present or it may have slightly
9 changed, which is part of my question.

10 My question is from 2014 to
11 2016, is there a general routine or an
12 approximate number of times that you go to
13 the tables per week, and if that changed a
14 little bit over time feel free to explain
15 that?

16 A. Because I am getting old so
17 presently I went -- I go there less. I
18 would say a day or two less than before.

19 Q. And you -- when you would go a
20 little bit more, is it correct you would
21 go a little bit more frequently in 2014
22 than presently?

23 A. Yes, of course. For
24 example -- so, yes, as a matter of fact,
25 you know, in the year 2008, right, I went

1 ZHANG

2 there very often, every day because I

3 loved to talk to everybody about the

4 truth, about how to be a nice person.

5 Q. So in 2014 approximately how

6 many days a week did you go to the tables

7 in Flushing?

8 A. Four to five days at a time.

9 Q. Okay. And in 2015 how many

10 did -- approximately how many days a week

11 would you go to the tables in Flushing?

12 A. Last year five days per week.

13 Q. And 2016?

14 A. Four days this year.

15 Q. You testified because you are

16 getting a little bit older you've slowed

17 down a little bit the number of times you

18 go to the tables, but is it correct that

19 despite your age you still go every day to

20 the park in the morning; is that correct?

21 A. Yes, every day practice, and I

22 feel good, and I feel healthy after

23 practice, very good.

24 Q. I run when I can, and it makes

25 me feel so much better. So I understand

EXHIBIT 13

EXCERPTS OF DEPOSITION OF TING XU

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF NEW YORK

INDEX NO. 15 CV 1046

-----x

EHANG Jingrong, EHOU Yanhua, EHANG Peng,
EHANG Cuiping, WEI Min, LO Kitsuen, LI
Xiurong, CAO Lijun, HU Yang, GAO Jinying,
CUI Lina, XU Ting, and BIAN Hexiang,

Plaintiffs,

- against -

Chinese Anti-Cult World Alliance (CACWA),
Michael CHU, LI Huahong,
WAN Hongjuan, ZHU Sirou, and DOES
1-5 Inclusive,

Defendants.

-----x

November 4, 2016

12:45 p.m.

VIDEOTAPE DEPOSITION of XU TING,
taken by the Defendants, pursuant to
notice, held at the offices of Veritext
Legal Solutions, LLP before
Debbie Saromatidis, a Notary Public of the
State of New York.

1

2 A P P E A R A N C E S:

3

4 HUMAN RIGHTS LAW FOUNDATION

5 Attorneys for Plaintiffs

6 1615 L Street, NW, Suite 1100

7 Washington, D.C. 20036

8 BY: TERRI MARSH, ESQ.

9

10

11 CATAFAGO FINI LLP

12 Attorneys for Defendants Chinese

13 Anti-Cult World Alliance, Michael Chu,

14 and Zhu Zirou

15 The Empire State Building

16 350 Fifth Avenue, Suite 7412

17 New York, New York 10118

18 BY: TOM M. FINI, ESQ.

19

20

21 ALSO PRESENT:

22 JONATHAN POPHAM, Videographer

23

24

25

1 XU

2 not only from the wording but also to the
3 core. So I appreciate and I can become a
4 good person, and I connect with the
5 principle of cosmos, and so -- and it is
6 not about that he -- actually it is not
7 about that -- he appear in his -- I think
8 he remind me, not only me, a lot of people
9 with good -- with his true divine self to
10 be awakened and to remind their -- their
11 memory. He kind of remind my memory and
12 also, okay, so I don't -- I don't trying
13 to -- but this is reasoning -- I am trying
14 to -- I am trying to reason he is not so
15 arrogant, but he is --

16 Q. Actually --

17 A. He --

18 Q. Hold on.

19 A. I couldn't see the other -- I
20 don't see the other teaching they are
21 copying Master Li's teaching, and also he
22 would know that the teaching has been
23 originally mentioned before in ancient
24 China he is mentioning again.

25 Q. Yes.

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1 XU
2 were -- before you came what Falun Gong
3 activities were you planning on doing as a
4 visitor?
5 A. Maybe some public held events
6 that have been organized like parade, like
7 sitting meditation.
8 Q. So you were planning on
9 participating in a parade and doing
10 meditation?
11 A. Yes.
12 Q. And were you aware -- before you
13 came were you aware of the five tables in
14 Flushing that the Falun Gong has?
15 A. I don't even -- how to say --
16 pay it too much attention about that, but
17 when I passing by -- I just pass by.
18 Nobody told me.
19 Q. Okay. So in your previous
20 visit to Flushing were you -- had you seen
21 the five Falun Gong tables or no?
22 A. I don't remember. I'm sorry.
23 Q. That's okay. And -- all right.
24 And had you been to the Taiwanese Cultural
25 Center where some Falun Gong people go?

Page 93

1 XU
2 A. Occasionally, yes.
3 Q. Okay.
4 A. When I have time.
5 Q. Were you planning on that trip,
6 the trip where this event happened, were
7 you planning on going to the Taiwanese
8 Cultural Center?
9 A. Actually when I have time I will
10 go. I did. Yes.
11 Q. Okay. And what about a park to
12 do exercises, a public park?
13 A. Actually my schedule would be
14 too -- sometimes when I have time I would
15 do some exercise, group exercise. Yes.
16 Q. Okay. So were you -- were you
17 planning on distributing literature for
18 Falun Gong?
19 A. It is not literature. It is
20 flyer.
21 Q. That is what I mean by
22 literature. Literature is just writings.
23 Were you planning on distributing fliers?
24 A. I am -- this is part of
25 my -- how to say -- activity because a lot

1 XU

2 New York at least a few more days or -- do
3 you know?

4 A. I think I -- I would be -- after
5 incident I think I come back to Canada,
6 very shortly come back. I think after
7 incident I think -- I think I -- I stay
8 very short -- short in New York and then
9 come back to Canada. I just don't
10 remember how many days I still remained.

11 Q. Okay. And do you remember what
12 you did -- if you remember, what -- after
13 the incident what did you do that was
14 Falun Gong related for the rest of the
15 trip? Did you see any Falun Gong friends
16 or have dinner with them, any interactions
17 with Falun Gong people after the incident?
18 Do you remember?

19 A. Actually I -- it is a long time.
20 Two years ago. What exactly happened
21 I -- I am normally living isolated
22 situation. I practice and exercise on
23 reading the books alone most of the time.
24 I don't -- maybe I -- I can buy some book
25 from them. Then I don't remember it any

1 XU

2 A. Yes, I agree.

3 Q. Everything he wrote? There
4 wasn't one time where you said come on?

5 A. I think I agree.

6 Q. Okay. You agree with
7 everything. Do you do cultivation
8 exercises?

9 A. Yes.

10 Q. Do you do it in public parks?

11 A. Sometimes.

12 Q. Okay.

13 MS. MARSH: You okay?

14 THE WITNESS: Yes, I'm fine.

15 MS. MARSH: Okay.

16 Q. Do you attend Falun Gong events
17 in Canada?

18 A. Yes.

19 Q. What events do you attend?

20 A. Falun Dafa day, some other
21 occasion, public parade, maybe the -- yes,
22 in July event to -- yes, calling to stop
23 persecution and sometime -- yes.

24 Q. Could you come and go to any
25 Falun Gong events you choose? Are you

1 XU

2 just God. In other words, you see God,
3 and you don't remember if you saw God?

4 A. Excuse me. I --

5 Q. You just don't remember whether
6 you saw God?

7 MS. MARSH: Objection.

8 Q. Is Li Hongzhi a God to you?

9 MS. MARSH: Objection.

10 Q. Is Li Hongzhi a God to you?

11 A. I am trying to answer you the
12 question.

13 Q. I know that. I am asking you
14 is Li Hongzhi a God to you?

15 MS. MARSH: Objection.

16 A. Master Li already tell people in
17 public places don't -- I never encourage
18 people to see me as a God. You can see
19 me as the human -- how to say -- as human
20 with all organs of human.

21 Q. But so --

22 A. Not exactly the wording.

23 Q. Do you view him as a special
24 type of person?

25 A. At least a saint.

1 XU

2 are trying to stop a lie in Flushing?

3 A. Yes.

4 Q. What is the lie you're trying to
5 stop in Flushing?

6 A. They lie about Mr. Li, whatever
7 they are trying to make him propaganda of
8 one sort or another, distributing material
9 saying that Falun Gong is cult. It is
10 evil. As you know, the other
11 historical cult happen in U.S. soil.
12 Like they -- whatever. So he like David.
13 So they are trying to defame Falun Gong,
14 which is a very are righteous practice of
15 truthfulness, compassion, and forbearance.

16 Q. So the reason you signed on to
17 the lawsuit is to stop the lies?

18 A. Yes.

19 MS. MARSH: Objection.

20 Q. Is that correct?

21 A. I want to some extent, yes, but
22 I think if I can -- if by -- by this way,
23 if I -- this is violence, yes. Lie is
24 more evil or harmful than -- it is another
25 form of violence against human kind.

1 XU

2 thing.

3 I also overhear that I was even
4 accused of you -- of cursing him to death.

5 You know, how it can -- how can it be
6 possible? I am civilized, educated person.

7 I cannot do this sort of thing in public
8 places at all. Whatever the allegation

9 in this regard is totally false

10 allegation, which I -- you know, from very

11 common sense it won't -- it's not make

12 sense. It is total lie. I don't -- I

13 don't curse him to death at the very

14 moment I encounter with him. On the

15 contrary I am trying to be nice with him,

16 and he slapped me back. Even he slap me,

17 I don't slap him back or curse him back,

18 no, with my teaching of Falun Gong of

19 compassion, forbearance, yes.

20 Q. Was the witness -- your attorney

21 has given me a piece of paper with the

22 name W-E-I and the next name J-I-A-N-G, so

23 it might be Wei Jiang. I apologize for

24 the pronunciation:

25 Do you know Wei Jiang?

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1 XU

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22 literature. Literature is just writings.
23 Were you planning on distributing fliers?

24 A. I am -- this is part of
25 my -- how to say -- activity because a lot

1 XU

2 New York after the -- this 2014 incident?

3 A. Yes, of course. Not only
4 including this time. I visit more.

5 Q. How many times?

6 A. Maybe a couple of times.

7 Q. Is it possible it was three
8 times?

9 A. New York not -- no.

10 Q. How many times did you visit New
11 York since the 2014 incident not including
12 this visit?

13 A. A couple.

14 Q. Two?

15 A. Maximum two.

16 Q. Okay.

17 A. I just don't remember.

18 Q. And did you go see Li Hongzhi in
19 Brooklyn?

20 A. No. Li Hongzhi, my master?

21 Q. The master.

22 A. My master I -- you know,
23 I -- this visit we -- yes, we kind of in
24 Brooklyn. This -- yes, this -- the
25 center, the conference center, yes. I

1 XU

2 A. Yes, I agree.

3 Q. Everything he wrote? There
4 wasn't one time where you said come on?

5 A. I think I agree.

6 Q. Okay. You agree with
7 everything. Do you do cultivation
8 exercises?

9 A. Yes.

10 Q. Do you do it in public parks?

11 A. Sometimes.

12 Q. Okay.

13 MS. MARSH: You okay?

14 THE WITNESS: Yes, I'm fine.

15 MS. MARSH: Okay.

16 Q. Do you attend Falun Gong events
17 in Canada?

18 A. Yes.

19 Q. What events do you attend?

20 A. Falun Dafa day, some other
21 occasion, public parade, maybe the -- yes,
22 in July event to -- yes, calling to stop
23 persecution and sometime -- yes.

24 Q. Could you come and go to any
25 Falun Gong events you choose? Are you

EXHIBIT 14

EXCERPTS OF DEPOSITION OF XIURONG LI

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF NEW YORK

INDEX NO. 15 CV 1046

-----x

ZHANG Jingrong, ZHOU Yanhua, ZHANG Peng,
ZHANG Cuiping, WEI Min, LO Kitsuen, LI
Xiurong, CAO Lijun, HU Yang, GAO Jinying,
CUI Lina, XU Ting, and BIAN Hexiang,
Plaintiffs,

- against -

Chinese Anti-Cult World Alliance (CACWA),
Michael CHU, LI Huahong,
WAN Hongjuan, ZHU Zirou, and DOES
1-5 Inclusive,
Defendants.

-----x

August 19, 2016

9:50 a.m.

VIDEOTAPE DEPOSITION of the LI
XIURONG, held at the offices of Beldock
Levine Hoffman & Goodman, LLP, pursuant to
Notice, before Debbie Zaromatidis, a
Notary Public of the State of New York.

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APPEARANCES:

HUMAN RIGHTS LAW FOUNDATION

Attorneys for Plaintiffs

1615 L Street, NW, Suite 1100

Washington, D.C. 20036

BY: TERRI MARSH, ESQ.

- and -

BELDOCK LEVINE & HOFFMAN, LLP

99 Park Avenue

New York, New York

BY: JOSHUA MOSKOVITZ, ESQ.

1

2 A P P E A R A N C E S: (CONTINUED)

3

4 CATAFAGO FINI LLP

5 Attorneys for Defendants Chinese

6 Anti-Cult World Alliance, Michael Chu,

7 and Zhu Zirou

8 The Empire State Building

9 350 Fifth Avenue, Suite 7412

10 New York, New York 10118

11 BY: TOM M. FINI, ESQ.

12

13

14

15

16 ALSO PRESENT:

17 PATRICK FENG, MANDARIN INTERPRETER

18 ARTHUR KWOK, Mandarin Interpreter

19 DANA CHENG, MANDARIN INTERPRETER

20 JONATHAN POPHAM, Videographer

21

22

23

24

25

1 LI

2 Q. What is the law wheel?

3 A. Law wheel was realized in
4 another universe.

5 Q. And does that have an impact on
6 our bodies here on earth?

7 A. Yes, it has.

8 Q. What is the impact it has on our
9 bodies on this earth?

10 A. I -- after I read the book I
11 believed there was the law wheel in
12 existence in another universe.

13 Q. Okay. And is there any part of
14 you that leaves open the idea that that
15 might not be true?

16 MR. MOSKOVITZ: Objection.

17 A. I never had any doubt it is
18 true.

19 Q. Did you have that strong feeling
20 of certainty the first time you read the
21 book?

22 A. My heart became comfortable, and
23 I -- I felt better. I believed in it.

24 Q. In China other than that book,
25 were there any other books you read by Li

1 LI

2 A. Yes.

3 Q. During the week would you
4 sometimes go to those tables and have
5 discussions with those Falun Gong
6 practitioners?

7 A. No.

8 Q. Did you ever volunteer to run
9 the tables or distribute pamphlets at the
10 tables?

11 A. No.

12 Q. Do you find that Falun Gong
13 meditation makes you calm?

14 A. Yes.

15 Q. Does Falun Gong medication give
16 you inner piece?

17 A. Very peaceful.

18 Q. So from 2001 to 2013 did you
19 engage in Falun Gong meditation?

20 A. Yes.

21 Q. And from 2001 to 2013 did that
22 meditation give you a daily inner piece?

23 A. I became a little bit afraid in
24 2011.

25 Q. Okay. Prior to 2011 -- from

1 LI

2 A. No.

3 Q. As a result of your meditation
4 with -- Falun Gong meditation, do you
5 sleep well at night?

6 A. Very good.

7 Q. Are you -- it's okay.

8 MR. FINI: Please tell her that
9 I will ask one or two more questions, and
10 then the videographer needs to change
11 tape.

12 Q. Would you agree that Arthur is a
13 very nice guy?

14 MR. FINI: Translate it.

15 A. Very good. Very good.

16 MR. FINI: Let's take a break.
17 Let's take a break.

18 THE VIDEOGRAPHER: Okay. We
19 are going off the record at 2:33 p.m.
20 This marks the end of media 2.

21 (Recess taken.)

22 THE VIDEOGRAPHER: We are back
23 on the record at 2:40 p.m. This marks
24 the beginning of media 3.

25 Q. So you testified earlier that

1 LI

2 Q. So you are not aware of a Time
3 Magazine article in which he gave an
4 interview, and he said aliens came from
5 another planet? You are not aware of that?

6 MR. MOSKOVITZ: Objection.

7 A. Well, other people mentioned at
8 times something about it. He wrote
9 something about it. I couldn't read it
10 myself. However, I don't think my Sifu
11 wrote that and said that exactly. I
12 don't think my Sifu said that.

13 Q. What about if he did? If he did
14 say that, would you accept that as true
15 just because he said it?

16 MR. MOSKOVITZ: Objection.

17 MS. MARSH: Objection.

18 A. I don't understand science, and
19 I don't care about that, so I am done.

20 Q. So you don't care if he said
21 something you wouldn't care about what he
22 says?

23 A. All I know is that if I practice
24 and meditate it will help me become a
25 better person, better health, and as far

1 LI

2 as I'm concerned I am already satisfied --

3 Q. Okay.

4 A. -- if that's the case.

5 Q. Do you believe that there is a
6 different heaven for black people and
7 white people?

8 A. It is not important. I don't
9 think -- I never really thought about it.
10 Maybe they -- they do have, but I don't
11 really know.

12 Q. So you think maybe there is a
13 different heaven for white people and
14 black people, correct?

15 MR. MOSKOVITZ: Objection.

16 A. I hope if I practice enough I
17 will get to heaven, and everybody who
18 practice enough will get to their heaven.
19 That's what I think.

20 Q. Right, but the jury will see
21 that you didn't answer my question.

22 MR. MOSKOVITZ: Objection.

23 MS. MARSH: Objection.

24 MR. MOSKOVITZ: That is not a
25 question.

1 LI

2 2001 to 2011, did you have inner piece
3 from your practice of Falun Gong
4 meditation?

5 A. Prior to that that was very
6 good.

7 Q. Okay. Now, today you live in
8 Flushing, correct?

9 A. I live in Flushing.

10 Q. Okay. And do you -- if I
11 -- let's talk about the last year, the
12 last twelve months.

13 Q. During the last 12 months do you
14 go to the -- typically to the Taiwanese
15 Cultural Center once a week?

16 A. Yes.

17 Q. And do you practice Falun Gong
18 there at the Taiwanese Cultural Center?

19 A. Yes, and also study Fa and study
20 the book.

21 Q. Okay. And are you free --
22 during the past twelve months in the
23 United States have you been free to go to
24 any of the Falun Gong events you choose to
25 go to?

Page 70

1 LI

2 Q. Is that --

3 A. I do not recall the address.

4 Q. Is it an indoor facility?

5 A. It was the office, and it was

6 our practitioner center.

7 Q. Is it indoors or outdoors?

8 A. Indoor office.

9 Q. How many people can it hold when
10 you meet as Falun Gong practitioners?

11 A. It's a very small room, and it
12 could hold approximately more than a dozen
13 people.

14 Q. Okay. And how often do you go
15 to that facility?

16 A. Five days a week I went over
17 there and place inside those photos and
18 displayed items.

19 Q. So from 2001 to 2013 when you
20 went to Maryland in addition to the
21 Taiwanese Cultural Center did you also go
22 to this center that we are talking about
23 now?

24 A. Yes, I went there to place those
25 photos.

Page 71

1 LI

2 Q. How often would you go from 2001
3 to 2013 on average during the week?

4 A. Five times.

5 Q. Did you go there Monday through
6 Friday?

7 A. Yes.

8 Q. And is that because that's where
9 you stored photos and posters that you
10 would use for a table and -- on Main
11 Street?

12 A. Yes.

13 Q. Were you one of the people
14 running one of the tables on Main Street?

15 A. I was not running the table. I
16 was one of the people that were involved.

17 Q. Okay. So when I say running
18 the table, I don't mean being in charge.
19 I mean helping with the table.

20 A. I cannot say I am a helper. I
21 just practiced Gong there.

22 Q. So five days a week from 2011 to
23 2013 you would help at a table on Main
24 Street, correct?

25 A. Yes.

1 LI

2 Q. How many hours a day?

3 A. Three hours.

4 Q. Okay. And where are the cars
5 on Main Street? The cars and vehicles on
6 this diagram, where would they be? Could
7 you show where the traffic would be?

8 A. The traffic cars are traveling
9 here. There are also sidewalks on the
10 other side.

11 Q. All right.

12 A. Cars are moving like this
13 (indicating).

14 Q. Okay. Is it the closest
15 route -- the shortest from your table to
16 the center where you store your posters is
17 walking passed the anticult table,
18 correct?

19 A. Yes, I have to pass them.

20 Q. I understand.

21 So you started to walk and
22 where -- where did Ms. Li Huahong, the
23 defendant, first go up to you on this
24 diagram?

25 A. As we were passing by I did not

1 LI

2 also have mixed marriages within our
3 group, and I remember him saying that
4 those children, the mixed -- those
5 children would have a good future as well.
6 That's what I remember --

7 Q. Okay.

8 A. -- him say.

9 Q. Have you -- did you go to
10 Barclay's Center?

11 MR. MOSKOVITZ: Objection.

12 A. Brooklyn, right?

13 Q. Yes.

14 A. I remember possibly we had a
15 meeting there at one point. Yes.

16 Q. Did you go to Barclay's Center
17 this year to see Li Hongzhi?

18 A. Yes. Yes.

19 Q. Do you know that Li Hongzhi
20 believes that beings from other planets,
21 aliens have come to earth within the last
22 200 years or so? Are you aware of that?

23 MR. MOSKOVITZ: Objection.

24 A. I don't think so. I don't
25 think my Sifu said things like that.

1 LI

2 Q. What types of Falun Gong
3 activities did you engage in from 2001 to
4 2013?

5 A. We have the parade and the
6 catering. The parade on the Memorial Day
7 of the event.

8 Q. What is the Memorial Day?

9 A. For example, July 20 is the day
10 that we were persecuted in China. We had
11 the parade I participated in.

12 Q. So is that a yearly parade?

13 A. Yes.

14 Q. So there is a parade in Flushing
15 every July 20?

16 A. The memorial event was held in
17 Washington.

18 Q. So is the -- is there a parade
19 every year in Washington?

20 A. Not every year. Sometimes in
21 New York. Sometimes in Washington.

22 Q. Okay. And is there a yearly
23 parade every single year in Flushing?

24 A. Almost, yes.

25 Q. What month is that in Flushing

1 LI

2 A. To insult and curse at my Sifu.

3 Q. So you want to use this lawsuit
4 to stop insulting Li Hongzhi?

5 MS. MARSH: Objection.

6 MR. MOSKOVITZ: Objection.

7 That is at least the fifth time this has
8 been asked. This isn't going anywhere.
9 We spent the last twenty minutes going
10 over and over this.

11 MS. MARSH: She keeps saying it
12 is her personal opinion.

13 MR. FINI: Can you read back the
14 question.

15 (Record read.)

16 A. Not just that, but to stop what
17 was done in the past to incite violence to
18 attack us. To stop us from freely
19 practicing Falun Gong, to place us in a
20 constant fear and nervousness.

21 Q. Okay. Aren't you free to
22 practice Falun Gong today?

23 A. Yes, in western countries I do
24 have freedom, especially America.

25 Q. So why did you just say that

1 LI

2 they are stopping you from practicing
3 Falun Gong? Why did you just say that?

4 MR. MOSKOVITZ: Objection.

5 A. Not trying but rather we were
6 attacked by using his inciting violence
7 tricks or intelligence to attack us, but
8 that hasn't affected your ability to
9 practice? You practice all you want,
10 correct?

11 MS. MARSH: Objection.

12 MR. MOSKOVITZ: Objection.
13 Argumentative.

14 A. It was a beautiful thing
15 originally to practice Falun Gong, but
16 because of what happened it's affected me,
17 affected my heart. There shouldn't be an
18 incident where it affected my emotion, my
19 feelings. It shouldn't happen in a
20 country that allow freedom of belief.

21 Q. Did you ever witness any of the
22 defendants touching any of the other
23 plaintiffs?

24 A. No, I did not. I did not see
25 it. I did not witness it.

EXHIBIT 15

EXCERPTS (A-E) FROM
U.S. COMMISSION ON INTERNATIONAL RELIGIOUS FREEDOM REPORTS

A. What USCIRF Does

United States Commission on International Religious Freedom

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Who We Are/What We Do

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WHO WE ARE

USCIRF is an independent, bipartisan U.S. federal government commission created by the 1998 International Religious Freedom Act (IRFA) that monitors the universal right to freedom of religion or belief abroad. USCIRF uses international standards to monitor religious freedom violations globally, and makes policy recommendations to the President, the Secretary of State, and Congress. USCIRF Commissioners are appointed by the President and Congressional leaders of both political parties. Their work is supported by a professional, nonpartisan staff. USCIRF is separate from the State Department, although the Department's Ambassador-at-Large for International Religious Freedom is a non-voting *ex officio* Commissioner.

WHAT IS RELIGIOUS FREEDOM

Inherent in religious freedom is the right to believe or not believe as one's conscience leads, and live out one's beliefs openly, peacefully, and without fear. Freedom of religion or belief is an expansive right that includes the freedoms of thought, conscience, expression, association, and assembly. While religious freedom is America's first freedom, it also is a core human right international law and treaty recognize; a necessary component of U.S. foreign policy and America's commitment to defending democracy and freedom globally; and a vital element of national security, critical to ensuring a more peaceful, prosperous, and stable world.

WHAT USCIRF DOES

- **Issues an Annual Report** by May 1st of each year. The report assesses the U.S. government's implementation of IRFA; recommends countries that the Secretary of State should designate as "Countries of Particular Concern" for engaging in or tolerating "systematic, ongoing, egregious violations of religious freedom;" documents country conditions in around 30 countries; reports on significant trends; and recommends U.S. policies.
- **Documents Religious Freedom Conditions Abroad** by meeting with senior government officials, representatives of nongovernmental organizations, religious leaders, victims of persecution, and others in countries including: Afghanistan, Bahrain, Bangladesh, Belarus, Burma, China, Egypt, Ethiopia, Eritrea, Indonesia, Iraq, Nigeria, Pakistan, Russia, Saudi Arabia, Syria, Sri Lanka, Sudan, Tajikistan, Turkey, Turkmenistan, Uzbekistan, and Vietnam.
- **Engages Congress** by working with Congressional offices, testifying at hearings, and holding briefings on issues including: protecting international religious freedom; Iran's human rights record under Rouhani; human rights abuses in Egypt; religious minorities in Syria; anti-Semitism; the persecution of religious and indigenous communities in Vietnam; persecuted Uighur Muslims in China.; and the plight of prisoners of conscience around the world. With the Tom Lantos Human Rights Commission, USCIRF launched the Defending Freedoms Project, working with Members of Congress to highlight religious prisoners and imprisoned human rights defenders worldwide.
- **Issues Reports with Policy Prescriptions, Press Releases, Op-Eds, and Journal Articles** including: the global use of blasphemy laws; religious violence in Pakistan; religious freedom provisions in the constitutions of Muslim-majority countries; Russia's failure to protect religious freedom; the status of religious minorities in Iran; religious violence in CAR; anti-Semitism; and the U.S. government's treatment of asylum seekers in Expedited Removal.
- **Engages Multilaterally** in meetings related to religious freedom and tolerance, including at the United Nations, the Organization for Security and Cooperation in Europe (OSCE), the European Union, and with parliamentarians from across the globe.

Translated Versions of USCIRF One-Pagers:

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B. USCIRF 2012 Report

U.S. Commission *on* International Religious Freedom

Annual Report 2012



Annual Report of the
United States Commission on International Religious Freedom
March 2012
(Covering April 1, 2011 – February 29, 2012)

Commissioners

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Chair

Dr. Don Argue

Dr. Elizabeth H. Prodromou

Vice Chairs

Felice D. Gaer

Dr. Azizah al-Hibri

Dr. Richard D. Land

Dr. William J. Shaw

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Ambassador Jackie Wolcott

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United States Commission on
International Religious Freedom

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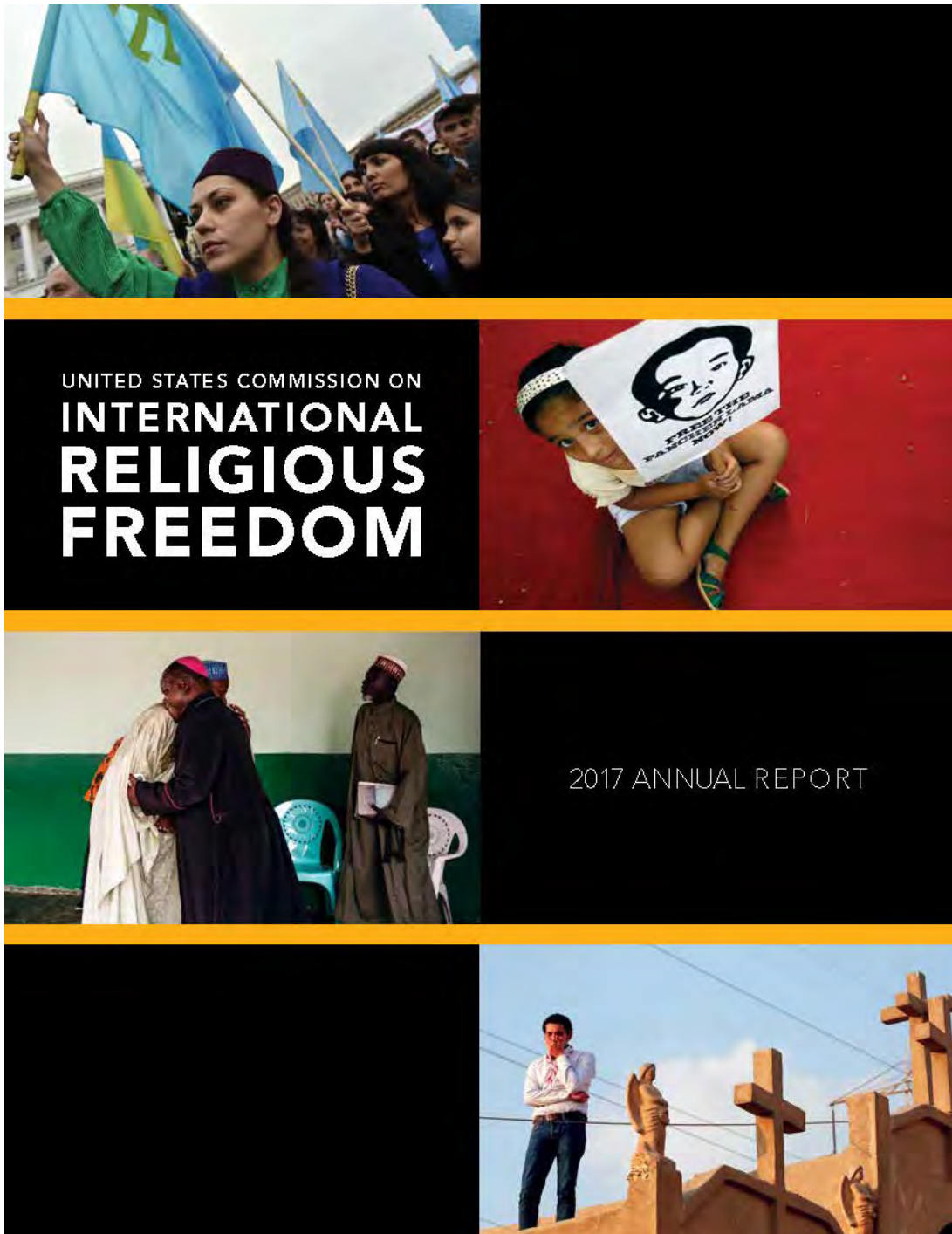
Tier 1 Countries of Particular Concern



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C. USCIRF 2017 Report





BACKGROUND

The year 2016 marked 50 years since the Cultural Revolution, some of the darkest days for China's religious and faith believers. Five decades later, Chinese government repression under President Xi increasingly threatens human rights, including freedom of religion or belief. For example, in 2016 China revised and enhanced its Regulations on Religious Affairs that limit the right to religious practice. New restrictions include tighter government control over religious education and clergy, and heavy fines for any religious activities considered "illegal," as well as new language formally forbidding religion from harming "national security" concerns. Earlier in the year, President Xi convened a National Conference on Religious Work where he stressed the importance of making religions more Chinese, in part by disconnecting them from foreign "infiltration" and influence. These actions coincided with the release of China's National Human Rights Action Plan (2016–2020), which includes a section on "freedom of religious belief" with undertones of restrictive government management of religion.

January 1, 2017, marked the effective date of a new Chinese law regulating foreign nonprofit and nongovernmental organizations (NGOs). Under the law, NGOs must obtain sponsorship from state bodies that will act as "supervisors," register with the police, and report their activities to the government. Some religious NGOs

expressed concern about how the law will impact their charity and aid work in China.

During 2016, the Chinese government reinforced its crackdown on lawyers and other human rights defenders. At the time of this writing, human rights lawyer and advocate Jiang Tianyong remained in detention at an unknown location after Chinese authorities detained him in November 2016 on suspicion of alleged "state subversion." In December 2016, a group of UN experts called on the Chinese government to investigate Jiang's whereabouts and expressed concern that his human rights work—including representing Tibetans, Falun

Gong practitioners, and others—puts him at risk for beatings and torture by police. Longtime human rights activist, lawyer, and political prisoner Peng Meng died in prison in late 2016. His family requested an autopsy, but according to reports, Chinese author-

New restrictions include tighter government control over religious education and clergy, and heavy fines for any religious activities considered "illegal". . . .

ities removed some of his organs and cremated his body, ignoring the family's wishes. Nobel Peace Prize laureate and democracy advocate Liu Xiaobo remains in prison after being sentenced in December 2009 to 11 years in prison; his wife, Liu Xia, is under strict house arrest.

Through five state-sanctioned "patriotic religious associations," China recognizes five religions: Buddhism, Taoism, Islam, Catholicism, and Protestantism. The Chinese Communist Party officially is atheist, and more than half the country's nearly 1.4 billion population is unaffiliated with any religion or belief. Nearly 300 million people practice some form of folk religion, approximately

250 million are Buddhist, about 70 million Christian, at least 25 million Muslim, and smaller numbers practice Taoism, Hinduism, Judaism, or some other faith.

RELIGIOUS FREEDOM CONDITIONS 2016–2017

Uighur Muslims

In 2016, the Chinese government continued to suppress Uighur Muslims, often under the rubric of countering what it alleges to be religious and other violent extremism. An estimated 10 million Uighur Muslims reside in the Xinjiang Uighur Autonomous Region in northwest China where the government presumes their guilt if they are found practicing “illegal” religious activities, including praying or possessing religious materials in their own homes. Authorities even question school-children to coerce them into revealing that their parents pray at home. To constrain what it claims to be widespread radicalism that breeds violent tendencies among Uighur Muslims, the government imposes manifold regulations and restrictions on religious and other daily practices. For example, in a move critics described as targeting Uighur Muslims, in July 2016 the regional government adopted a new counterterrorism measure, which dovetails with a national law that went into effect January 1, 2016. (The national Counterterrorism Law contains vague definitions of “religious extremism” and “terrorism,” which the government has routinely used to target the freedom to practice religion and peaceful religious expression.) Also, in June 2016, Beijing issued a white paper, *Freedom of Religious Belief in Xinjiang*, that alleged the government protects “normal” religious activities and respects citizens’ religious needs and customs. Just days later, however, the government once again imposed its annual ban on the observance of Ramadan: authorities prevented government employees, students, and children from fasting, and in some cases praying, during Ramadan. As of November 1, 2016, Uighur Muslim parents are forbidden from including their children in any religious activity, and citizens are encouraged to inform authorities about

Uighur Muslim parents are forbidden from including their children in any religious activity, and citizens are encouraged to inform authorities about their neighbors.

their neighbors who may be involved in government-prohibited activities.

Authorities continue to restrict men from wearing beards and women from wearing headscarves and face-covering veils. According to reports, in 2016 the Chinese government destroyed thousands of mosques in Xinjiang, purportedly because the buildings were considered a threat to public safety. USCIRF received reports that Uighur Muslims must register to attend mosques—which often are surveilled by authorities—and must obtain permission to travel between villages.

Uighur Muslim prisoners commonly receive unfair trials and are harshly treated in prison. Well-known Uighur scholar Ilham Tohti is currently serving a life sentence after being found guilty in 2014 of “separatism” in a

two-day trial that human rights advocates called a sham. On October 11, 2016, Professor Tohti was awarded the 2016 Martin Ennals Award for Human Rights Defenders; China responded with anger when UN High Commissioner for Human Rights

Zeid Ra’ad Al Hussein attended the ceremony. Gulmira Imin, who was a local government employee at the time of her arrest, also continues to serve a life sentence for her alleged role organizing the July 2009 protests in Urumqi—an allegation she denies.

Tibetan Buddhists

The Chinese government claims the power to select the next Dalai Lama with the help of a law that grants the government authority over reincarnations. The Chinese government also vilifies the Dalai Lama, accusing him of “splittism” and “blasphemy,” including in at least 13 white papers on Tibet since the 1990s. Moreover, in December 2016, Tibet’s Communist Party Chief Wu Yingjie publicly said he expects the party’s control over religion in Tibet to increase. In 2016, Tibetan activist Nyima Lhamo, the niece of prominent Tibetan Buddhist leader Tenzin Delek Rinpoche, who died in prison in July 2015, fled China to seek justice for her uncle’s death and later traveled to Europe where she gave a presentation before the 9th Geneva Summit for Human Rights and Democracy. The

Chinese government has held Gedhun Choekyi Nyima, also known as the Panchen Lama, the second-highest position in Tibetan Buddhism, in secret for more than two decades. When the Chinese government abducted the Panchen Lama at age six and replaced him with its own hand-picked choice, the Dalai Lama had just designated him as the reincarnation of the 10th Panchen Lama. Although in 2016 the government released several Tibetan prisoners who completed their sentences, such as Tibetan religious teacher Khenpo Karise, it detained and charged several others. For example, in March 2016 Chinese police arrested Tashi Wangchuk on “separatism” charges; he is an advocate known for promoting a deeper understanding of the Tibetan language as integral to the practice of Tibetan Buddhism. As of this writing, Tashi Wangchuk’s case is still pending; he could serve up to 15 years if convicted. In protest of repressive government policies, at least 147 Tibetans have self-immolated since February 2009, including Tibetan monk Kalsang Wangdu and Tibetan student Dorjee Tsering, both in 2016.

In July 2016, the Chinese government launched a sweeping operation to demolish significant portions of the Larung Gar Buddhist Institute located in Sichuan Province. Larung Gar is home to an estimated 10,000 to 20,000 monks, nuns, laypeople, and students of Buddhism from all over the world. Local officials instituting the demolition order referred to the project as “construction” or “renovation” to reduce the number of residents to no more than 5,000 by the end of September 2017. As a result, officials have evicted thousands of monastics, laypeople, and students, some of whom reportedly were locked out of their homes before they could collect their belongings, or were forced to sign pledges promising never to return. Many others were forced to undergo so-called “patriotic reeducation programs.” The demolition order contains language governing ideology and future religious activities at Larung Gar and gives government officials—who are largely Han Chinese, not Tibetan—greater control and oversight of the institute, including direct control over laypeople. The order also mandates the separation of the monastery from the

institute, running counter to the tradition of one blended encampment with both religious and lay education. The destruction at Larung Gar exemplifies Beijing’s desire to eviscerate the teachings and study of Tibetan Buddhism that are integral to the faith.

Protestants and Catholics

In 2016, the Chinese government continued its campaign to remove crosses and demolish churches. Since 2014, authorities have removed crosses or demolished churches at more than 1,500 locations in Zhejiang Province alone. The government also has targeted individuals opposing the campaign. In February 2016, Protestant Pastor Bao Guohua and his wife Xing Wenxiang, from Zhejiang, were sentenced to 14 and 12 years’ imprisonment, respectively, for opposing cross removals. Additional removals and demolitions have occurred elsewhere in the country. In one particularly egregious example from April 2016, Ding Cuimei, wife of church leader Li Jianguo, suffocated to death while trying to protect their house church in Henan Province from a bulldozer during a government-ordered demolition; Li survived but barely escaped the rubble. In March 2016, authorities released human rights lawyer Zhang Kai on bail after detaining him in secret for six months and coercing him to give a televised confession.

On December 27, 2016, police summoned Zhang to the police station and detained him for two days before releasing him again. Zhang is well known for his work on behalf of individuals and churches affected by the government’s cross

removal and church demolition orders.

During 2016, Chinese authorities arrested Christians for displaying the cross in their homes and printing religious materials, threatened parents for bringing their children to church, and blocked them from holding certain religious activities. In August 2016, a Chinese court found underground church leader and religious freedom advocate Hu Shigen guilty of subversion and sentenced him to seven and a half years in prison and another five years’ deprivation of political rights. In January 2017, a Chinese court sentenced Pastor Yang Hua, also known as Li Guozhi, to two and a half

The destruction at Larung Gar exemplifies Beijing’s desire to eviscerate the teachings and study of Tibetan Buddhism. . . .

years in prison. Originally detained in December 2015, Pastor Yang presided over the Living Stone Church, an unregistered house church in Guizhou Province.

China also continued to target individuals affiliated with state-sanctioned churches. On March 31, 2016, Gu “Joseph” Yuese, former pastor at Chongyi Church, a Protestant megachurch in Zhejiang Province, was released from more than two months’ detention after being arrested on embezzlement charges. Authorities detained him again in December 2016, and on January 7, 2017, Pastor Gu was formally charged with embezzlement. Pastor Gu publicly criticized the government’s cross removal campaign in Zhejiang. In addition to his arrests, he was removed from his post at Chongyi Church and his role with the local state-run China Christian Council. Also, Pastor Zhang Shaojie of the state-registered Nanle County Christian Church remains in prison after being sentenced in 2014 to 12 years in prison for “gathering a crowd to disrupt public order.”

In 2016, the Vatican and Beijing attempted to reach agreement on the appointment of Catholic bishops. Although there are several bishops both appointed by the Chinese government and recognized by the Vatican, Beijing refuses to respect papal authority, and bishops seeking Rome’s blessing do so at risk of imprisonment or other persecution. Proponents of an agreement see it as a means to repair the nearly 70-year dispute between the Vatican and Beijing and create uniformity across Catholic clergy in China. However, critics worry that by aligning with Beijing, the Vatican risks betraying the underground clergy and followers who have remained loyal to the Pope’s authority to appoint bishops. At a December meeting of China’s state-run Catholic Patriotic Association, Chinese officials stressed “sinicization,” socialism, and independence from foreign influence, a message seemingly incongruous with Beijing’s attempts to reach agreement with the Vatican. Prospects for an agreement also became strained when excommunicated Bishop Lei Shiyin participated in two ordinations approved by both the Vatican and the Chinese government in late November and early December 2016.

Falun Gong

The practice of Falun Gong has been banned since 1999 after the Chinese government labeled it an “evil cult,” and practitioners have been severely mistreated ever

since. They are regularly confined in labor camps or prisons, or disappear altogether. While detained, Falun Gong practitioners suffer psychiatric and other medical experimentation, sexual violence, torture, and organ harvesting. A new report released in June 2016 by the International Coalition to End Organ Pillaging in China revealed that 60,000–100,000 organ transplants are performed in the country each year, an alarming discrepancy from the government’s claim of 10,000. Organ donors often are nonconsenting, particularly executed Falun Gong prisoners and detainees, though individuals from other faiths also have been targeted, such as Uighur Muslims, Tibetan Buddhists, and Christians.

Organ donors often are nonconsenting, particularly executed Falun Gong prisoners and detainees. . . .

Zhiwen Wang, a Falun Gong practitioner who was persecuted and imprisoned for 15 years, was released in 2014, but the Chinese government has prevented him from receiving proper medical care and reuniting with his family in the United States. In 2016, Zhiwen was granted a passport and U.S. visa to leave China, but a customs agent at the airport nullified his passport. This occurred after Chinese police and undercover agents harassed and intimidated Zhiwen and his family for several days. For the second year in a row, in 2016 Chinese authorities attempted to suppress Chinese-born human rights advocate and Falun Gong practitioner Anastasia Lin. Chinese authorities had denied her a visa and barred her entry into mainland China from Hong Kong when the country hosted the 2015 Miss World competition. She competed in the 2016 Miss World competition in Washington, DC, but Chinese journalists and other “minders” relentlessly followed her, and pageant officials interfered with her ability to speak to the media and initially barred her from attending a screening of “The Bleeding Edge,” a movie about China’s forced organ harvesting in which she stars.

Forced Repatriation of North Korean Refugees

The Chinese government claims North Koreans entering China without permission are economic migrants, but

D. USCIRF 2013 Report



Soe Zeya Tun/Reuters

UNITED STATES COMMISSION ON INTERNATIONAL RELIGIOUS FREEDOM

Annual Report 2013



**Annual Report of the
U.S. Commission on International Religious Freedom**

**April 2013
(Covering January 31, 2012 – January 31, 2013)**

Commissioners

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Executive Director

**CHINA (INCLUDES TIBET, HONG KONG, AND MACAU)
2013 INTERNATIONAL RELIGIOUS FREEDOM REPORT**

Executive Summary

Reports on Tibet, Hong Kong, and Macau are appended at the end of this report.

The constitution states citizens enjoy “freedom of religious belief” but limits protections for religious practice to “normal religious activities.” The government applies this term in a manner that is not consistent with China’s international human rights commitments with regard to freedom of religion. In practice, the government restricted religious freedom. The constitution also proclaims the right of citizens to believe in or not believe in any religion. Only religious groups belonging to one of the five state-sanctioned “patriotic religious associations” (Buddhist, Taoist, Muslim, Catholic, and Protestant), however, are permitted to register with the government and legally hold worship services. The government’s respect for religious freedom overall remained low during the year. In Tibetan areas and the Xinjiang Uighur Autonomous Region (XUAR) there were particularly serious violations of religious freedom.

The government exercised state control over religion and restricted the activities and personal freedom of religious adherents when these were perceived, even potentially, to threaten state or Chinese Communist Party (CCP) interests, including social stability. The government harassed, assaulted, detained, arrested, or sentenced to prison a number of religious adherents for activities reported to be related to their religious beliefs and practices. There were also reports of physical abuse and torture in detention.

Local authorities often pressured unaffiliated religious believers to affiliate with patriotic associations and used a variety of means, including administrative detention, to punish members of unregistered religious or spiritual groups. In some parts of the country, however, local authorities tacitly approved of or did not interfere with the activities of unregistered groups.

There was societal and employment discrimination based on religious affiliation, belief, or practice. Uighur Muslims and Tibetan Buddhists experienced severe societal discrimination, especially around sensitive periods.

U.S. officials at all levels repeatedly and publicly expressed concerns and pressed for the expansion of religious freedom. U.S. officials consistently urged the government to adhere to internationally recognized rights of religious freedom,

CHINA (INCLUDES TIBET, HONG KONG, AND MACAU)

sentenced to 18 years in prison in 2000 on charges of using a heretical sect to obstruct justice, remained in prison.

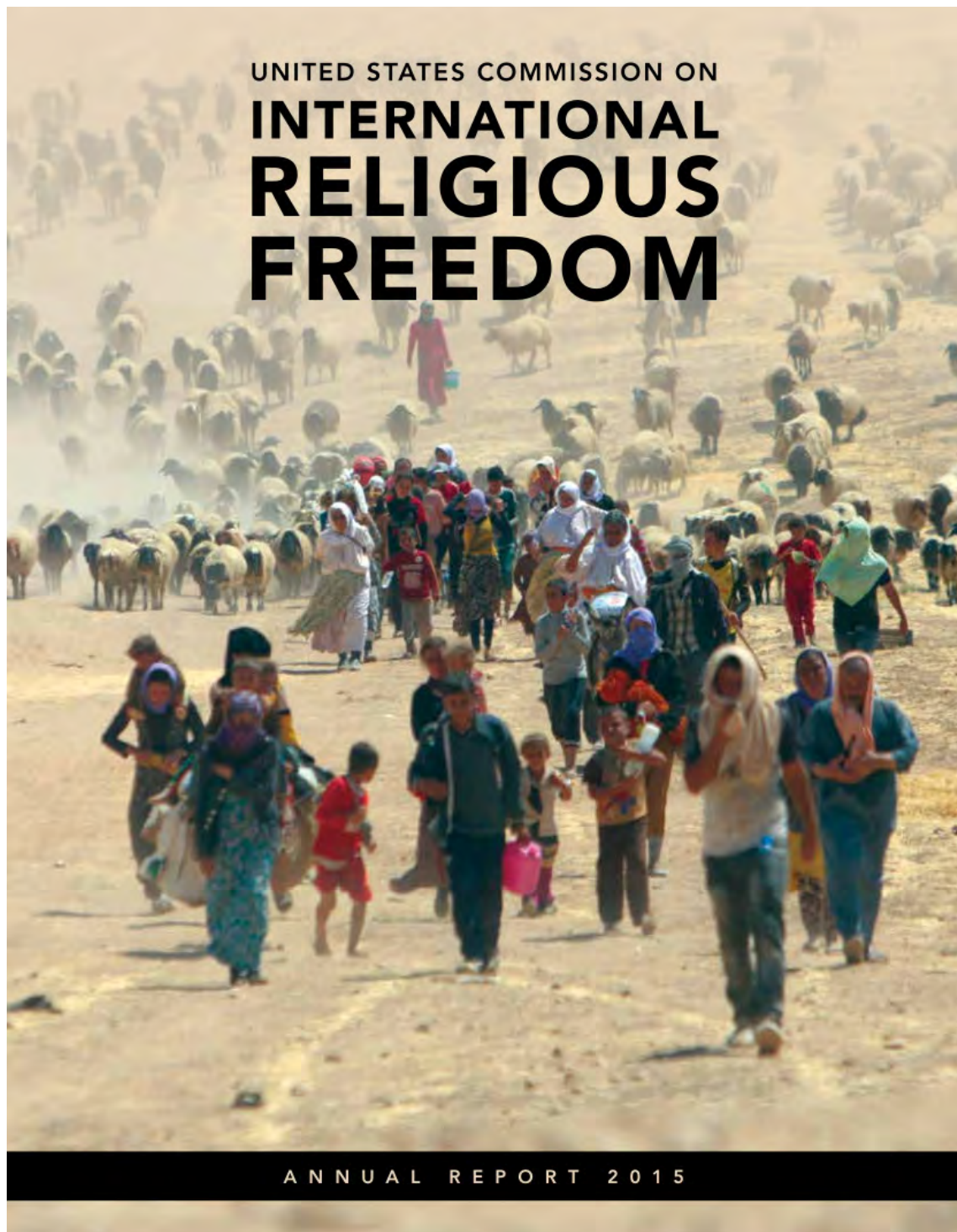
According to *Legal Daily*, a newspaper published under the supervision of the Ministry of Justice, the MPS directly administered 24 high-security psychiatric hospitals for the criminally insane (also known as *ankang* facilities). Unregistered religious believers and Falun Gong adherents were among those reported to be held solely for their religious association in these institutions. Despite October 2012 legislation banning involuntary inpatient treatment (except in cases in which patients expressed an intent to harm themselves or others), critics stated the law did not provide meaningful legal protection for persons sent to psychiatric facilities. Patients in these hospitals reportedly were given medicine against their will and sometimes subjected to electric shock treatment.

International Falun Gong-affiliated NGOs and international media reported detentions of Falun Gong practitioners continued to increase around sensitive dates. Authorities reportedly instructed neighborhood communities to report Falun Gong members to officials and offered monetary rewards to citizens who informed on Falun Gong practitioners. Detained practitioners were reportedly subjected to various methods of physical and psychological coercion in attempts to force them to renounce their beliefs. It remained difficult to confirm some aspects of reported abuses of Falun Gong adherents. Reports from overseas Falun Gong-affiliated advocacy groups estimated thousands of adherents in the country had been sentenced to administrative sentences of up to three years in RTL camps. According to an April investigative article published in a mainland Chinese magazine, officials at Liaoning Province's Masanjia Labor Camp subjected prisoners to forced labor and abuses, including torture with electric batons, forced feeding, and prolonged solitary confinement. In November the international press reported the Masanjia Labor Camp had been closed, with its last group of detainees having been released in mid-September. Officials did not confirm these reports. Overseas Falun Gong advocacy groups stated the majority of prisoners at Masanjia were Falun Gong practitioners.

Individuals belonging to or supporting other banned groups were imprisoned or administratively sentenced to RTL on charges such as "distributing evil cult materials" or "using a heretical organization to subvert the law."

On numerous occasions since his detention in 2009, prison authorities tortured Wang Yonghang, a lawyer who openly advocated for religious freedom and defended Falun Gong practitioners. He was serving a seven-year sentence for

E. USCIRF 2015 Report



ANNUAL REPORT

OF THE U.S. COMMISSION ON INTERNATIONAL RELIGIOUS FREEDOM

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Ambassador Jackie Wolcott
Executive Director

CHINA

Key Findings

In 2014, the Chinese government took steps to consolidate further its authoritarian monopoly of power over all aspects of its citizens' lives. For religious freedom, this has meant unprecedented violations against Uighur Muslims, Tibetan Buddhists, Catholics, Protestants, and Falun Gong practitioners. People of faith continue to face arrests, fines, denials of justice, lengthy prison sentences, and in some cases, the closing or bulldozing of places of worship. Based on the alarming increase in systematic, egregious, and ongoing abuses, USCIRF again recommends China be designated a "country of particular concern," or CPC, under the International Religious Freedom Act (IRFA). The State Department has designated China as a CPC since 1999, most recently in July 2014.

Background

The Chinese Constitution states that it guarantees freedom of religion. However, only so-called "normal religions" – those belonging to one of the five state-sanctioned "patriotic religious associations" associated with the five officially-recognized religions (Buddhism, Taoism, Islam, Catholicism, and Protestantism) – can register with the government and legally hold worship services and conduct religious activities. The government and Chinese Communist Party are officially atheist, with more than 700 million persons unaffiliated with any religion or belief. However, religious followers are strong and reportedly on the rise: more than 294 million practice folk religions, more than 240 million Buddhism, 68 million Christianity, and nearly 25 million Islam. The Chinese government monitors strictly religious activities, including by those recognized by the state, but unregistered groups and their members are especially vulnerable. For example, although Christianity is state-sanctioned, the government continues to engage in severe violations of reli-

gious freedom against both registered and unregistered Catholics and Protestants. Some have characterized the new wave of persecution against Christians that swept through China in 2014 as the most egregious and persistent since the Cultural Revolution. Nevertheless, the number of religious followers, of Christianity in particular, is considered to be growing.

In the name of fighting terrorism, Chinese officials' increased religious persecution of Uighur Muslims in the autonomous region of Xinjiang has gone hand-in-hand with the growing number of violent episodes there, creating a perpetual cycle of government repression, violent Uighur reprisals, and deadly force by the Chinese police. Both central and regional government officials have undertaken pre-emptive security and punitive legal measures.

The Chinese communist regime, which celebrated its 65th anniversary in October 2014, views ideologies that promote freedom of speech, civil society, genuine rule of law, and human rights as directly undermining

People of faith continue to face arrests, fines, denials of justice, lengthy prison sentences, and in some cases, the closing or bulldozing of places of worship.

its control. As a result, all-around repression in China worsened in 2014, including the government's aggressiveness in controlling Tibet, Xinjiang, and even Hong Kong, as well as stricter controls on the Internet and social media and targeting of human rights defenders, civil society activists, journalists and academics. For example, Pu Zhiqiang, a prominent human-rights lawyer, was charged in June 2014 with creating a disturbance, inciting ethnic hatred, and separatism based

EXHIBIT 16

EXCERPTS FROM AUGUST 15, 2017 REMARKS OF SECRETARY OF STATE TILLERSON

11/9/2017

Remarks on the 2016 International Religious Freedom Annual Report

U.S. Department of State
Diplomacy in Action

Remarks on the 2016 International Religious Freedom Annual Report

Remarks
Rex W. Tillerson
Secretary of State
Treaty Room
Washington, DC
August 15, 2017

SECRETARY TILLERSON: Morning, all. We are releasing today the **2016 International Religious Freedom Report**, (<https://www.state.gov/j/drl/rls/irf/religiousfreedom/index.htm>). This report is a requirement pursuant to the International Religious Freedom Act of 1998 – legislation that upholds religious freedom as a core American value under the Constitution's First Amendment, as well as a universal human right. This law calls for the government to, quote, "[Stand] for liberty and [stand] with the persecuted, to use and implement appropriate tools in the United States foreign policy apparatus, including diplomatic, political, commercial, charitable, educational, and cultural channels, to promote respect for religious freedom by all governments and peoples."

Almost 20 years after the law's passage, conditions in many parts of the world are far from ideal. Religious persecution and intolerance remains far too prevalent. Almost 80 percent of the global population live with restrictions on or hostilities to limit their freedom of religion. Where religious freedom is not protected, we know that instability, human rights abuses, and violent extremism have a greater opportunity to take root.

We cannot ignore these conditions. The Trump administration has committed to addressing these conditions in part by advancing international religious freedom around the world. The State Department will continue to advocate on behalf of those seeking to live their lives according to their faith.

The release of the **2016 International Religious Freedom Report** (<https://www.state.gov/j/drl/rls/irf/religiousfreedom/index.htm>) details the status of religious freedom in 199 countries and territories, and provides insights as to significant and growing challenges. Today I want to call out a few of the more egregious and troubling examples.

As we make progress in defeating ISIS and denying them their caliphate, their terrorist members have and continue to target multiple religions and ethnic groups for rape, kidnapping, enslavement, and even death.

To remove any ambiguity from previous statements or reports by the State Department, the crime of genocide requires three elements: specific acts with specific intent to destroy in whole or in part specific people, members of national, ethnic, racial, or religious groups. Specific act, specific intent, specific people.

Application of the law to the facts at hand leads to the conclusion ISIS is clearly responsible for genocide against Yazidis, Christians, and Shia Muslims in areas it controls or has controlled.

ISIS is also responsible for crimes against humanity and ethnic cleansing directed at these same groups, and in some cases against Sunni Muslims, Kurds, and other minorities.

More recently, ISIS has claimed responsibility for attacks on Christian pilgrims and churches in Egypt.

The protection of these groups – and others subject to violent extremism – is a human rights priority for the Trump administration.

We will continue working with our regional partners to protect religious minority communities from terrorist attacks and to preserve their cultural heritage.

11/9/2017

Remarks on the 2016 International Religious Freedom Annual Report

As the 2016 report indicates, many governments around the world use discriminatory laws to deny their citizens freedom of religion or belief.

In Iran, Baha'is, Christians, and other minorities are persecuted for their faith. Iran continues to sentence individuals to death under vague apostasy laws – 20 individuals were executed in 2016 on charges that included, quote, "waging war against God." Members of the Baha'i community are in prison today simply for abiding by their beliefs.

We remain concerned about the state of religious freedom in Saudi Arabia. The government does not recognize the right of non-Muslims to practice their religion in public and applied criminal penalties, including prison sentences, lashings, and fines, for apostasy, atheism, blasphemy, and insulting the state's interpretation of Islam. Of particular concern are attacks targeting Shia Muslims, and the continued pattern of social prejudice and discrimination against them. We urge Saudi Arabia to embrace greater degrees of religious freedom for all of its citizens.

In Turkey, authorities continued to limit the human rights of members of some religious minority groups, and some communities continue to experience protracted property disputes. Non-Sunni Muslims, such as Alevi Muslims, do not receive the same governmental protections as those enjoyed by recognized non-Muslim minorities and have faced discrimination and violence. Additionally, the United States continues to advocate for the release of Pastor Andrew Brunson, who has been wrongfully imprisoned in Turkey.

And in Bahrain, the government continued to question, detain, and arrest Shia clerics, community members, and opposition politicians. Members of the Shia community there continue to report ongoing discrimination in government employment, education, and the justice system. Bahrain must stop discriminating against the Shia communities.

In China, the government tortures, detains, and imprisons thousands for practicing their religious beliefs. Dozens of Falun Gong members have died in detention. Police – policies that restrict Uighur Muslims' and Tibetan Buddhists' religious expression and practice have increased.

Religious freedom is under attack in Pakistan, where more than two dozen are on death row or serving a life imprisonment for blasphemy. The government marginalizes Ahmadiyya Muslims, and refuses to recognize them as Muslim. It is my hope that the new prime minister and his government will promote interfaith harmony and protect the rights of religious minorities.

Finally, in Sudan the government arrests, detains, and intimidates clergy and church members. It denies permits for the construction of new churches and is closing or demolishing existing ones.

We encourage the Government of Sudan to engage concretely on the religious freedom action plan provided by the department last year.

Unfortunately, the list goes on.

No one should have to live in fear, worship in secret, or face discrimination because of his or her beliefs. As President Trump has said, we look forward to a day when, quote, "people of all faiths, Christians and Muslims and Jewish and Hindu, can follow their hearts and worship according to their conscience," end quote.

The State Department will continue its efforts to make that a reality. Recently nominated Ambassador-at-Large for International Religious Freedom, Governor Sam Brownback, will be the highest-ranking official ever to take up this important post. We look forward to his swift confirmation.

I thank my many colleagues at the department and overseas who contributed to this report, and specifically the Office of International Religious Freedom, including Senior Advisor on Global Justice Issues Pam Pryor, Special Advisor for Religious Minorities Knox Thames, and the previous ambassador-at-large, David Saperstein.

We look forward to working with Congress, and the administration, to continue America's indispensable role as a champion of religious freedom the world over. Thank you very much.

QUESTION: Mr. Secretary, do you have any response to Kim Jong-un's decision to pull back his threat on Guam?

SECRETARY TILLERSON: No, I have no response to his decisions at all at this time. Thank you.

QUESTION: Any comments on the situation there, in North Korea?

<https://www.state.gov/secretary/remarks/2017/08/273449.htm>

11/9/2017

Remarks on the 2016 International Religious Freedom Annual Report

SECRETARY TILLERSON: We continue to be interested in finding a way to get to a dialogue, but that's up to him. Thank you.

Learn More

[Ambassador Michael Kozak Briefs on the 2016 International Religious Freedom Annual Report»](#)

<http://www.state.gov/r/pa/prs/ps/2017/08/273457.htm>

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